

## *PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)*

*The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:*

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*[13] Sec. 102(b)(2)(D)(iii) of WIOA*

### *a. INPUT OF STATE REHABILITATION COUNCIL*

*All agencies, except for those that are independent consumer-controlled commissions, must describe the following:*

- 1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;*

The responsibilities of the Idaho State Rehabilitation Council (SRC) are outlined in the Rehabilitation Act of 1973, as amended.

The SRC and IDVR changed the input period from a calendar year to a program year with this State Plan, to better align with the VR program reporting period.

The SRC's input during PYs 2019 and 2020 can be summarized within three broad areas: 1) strategic planning and manual input; 2) survey input; and 3) collaborative reporting.

Furthermore, IDVR engaged with the SRC on the 2022-2023 draft modification of the State Plan in January 2022 including a review of the state plan elements and the recommended goals and priorities of the Division at the January 2022 SRC quarterly meeting. SRC feedback was supportive of IDVR strategies addressing recruitment and retention challenges, efforts to further align and leverage the workforce development system, and the development of a VR Counselor position for the deaf and hard of hearing. Other grammatical feedback was provided and accepted by the Division.

Following SRC review of the 2022-2023 draft plan, the Council participated in a Strategic Planning and Prioritization session held in March 2022. This session further addressed SRC interests including:

- CRP improvement activities
- Comprehensive services to individuals with MSD
- Expanding partnerships
- Pre-ETS expansion and improvement
- Recruitment and retention issues
- Services to business/Business relations coordination

A period of public comment was held January 18, 2022, through February 11, 2022, including two statewide calls held February 3, 2022. SRC recommendations were incorporated into the final version of this plan where applicable.

## **1. Business Engagement**

### ***SRC Input***

The SRC members, particularly those members who represent business, industry, and labor, participated in a strategic planning process with the Business Engagement Team (BET) and other VR staff to develop a Business Engagement strategic plan. During our next quarterly meeting, after the planning process, the IDVR Deputy Administrator reviewed a Business Engagement Strategic Planning summary document and asked the SRC to provide feedback and comments. An SRC member commented that the focus on employers and how VR can benefit employers is a positive and effective message in the strategic planning goals. The outcome of the relationship benefiting VR customers

## **1. Field Services Policy Manual**

### ***SRC Input***

The current Field Services Policy Manual (FSPM) is no longer a document referenced in IDAPA rule. Yet, according to the 34 CFR 361.20 public comment is required when IDVR makes substantive changes to policy. Due to changes, which were considered substantive, a period of public comment on the draft FSPM occurred, which included phone sessions, emails to stakeholders, posted notices in IDVR offices, as well as posted on the external website. SRC members extensively reviewed the draft FSPM prior to it being finalized and posted on the IDVR website. In addition to identifying minor grammar and formatting issues, the SRC policy sub-committee members recommended that IDVR add Code of Federal Regulation (CFR) citations to all major policy sections. It was also recommended that IDVR make changes to the closure policy to increase readability and clarity.

## **1. Customer Access to Services During COVID-19 Survey**

### ***SRC Input***

IDVR sent out 3,500 surveys (paper and electronic) to current customers with a 18% response rate. The results indicate that 92% of customers have access to their VR Counselor. Those indicating lack of access to service cited a fear of COVID-19 and technology challenges. Moreover, 85% of the respondents stated they can access services they needed to move forward with their employment plans, with 50% affirmed they can access employment opportunities. SRC members wondered if the respondents self-identified, so there could be outreach back to them if they cited needs. They also posed the idea of using other mechanisms to distribute the survey beyond a letter such as phone calls or text messages, to increase response rates.

## **1. Comprehensive Statewide Needs Assessment**

### ***SRC Input***

Previously, IDVR and SRC re-designed the CSNA surveys, and these survey results informed State Plan goals and priorities. Additionally, the SRC reviewed the CSNA report and prioritized elements based upon those areas which are important to the SRC members. SRC members are most

concerned with improving the quality of services provided by CRPs, staff retention and turnover which impacts quality service delivery, increase outreach, continue to expand and improve Pre-ETS.

## **1. State Plan**

### ***SRC Input***

In the January 2020 SRC quarterly meeting, IDVR presented emerging goals and priorities resulting from the current draft CSNA to the SRC at large, compared to previous VR State Plan goals and priorities. The SRC agreed that these were relevant and important goals and priorities and that they remained consistent with the previous state plan and strategic plan goals. In February 2020, several members of the SRC participated in a strategic planning session with IDVR management staff to jointly develop the goals and priorities for the Division, which would be included in the VR Portion of the State Plan.

The SRC Vice Chair reviewed the entire VR Portion of the Combined State Plan and acknowledged agreement with the goals and priorities.

Furthermore, SRC input into the 2022-2023 draft modification of the State Plan was solicited alongside the public comment period. SRC recommendations have been incorporated into the final version of this plan where applicable.

## **1. Annual Report**

### ***SRC Input***

The SRC Annual Report is a collaborative effort between the SRC and IDVR. The format and content design are an ongoing discussion for several months. This is followed by a group effort of writing and edits with contribution from several members. The last 2 years Annual Reports included a COVID-19 focus with narratives and data weighing heavily on everyone's minds.

## ***2. The designated State unit's response to the Council's input and recommendations; and***

During PYs 2019-2020 the SRC provided input and recommendations to IDVR on a variety of subjects. IDVR agreed with and or adopted all but one suggestion provided by the SRC. The following summarizes IDVR's responses to that input and recommendations.

### ***IDVR Responses***

## **1. Business Engagement**

IDVR appreciates the involvement of the SRC members in the Business Engagement strategic planning process. Furthermore, the Division agrees that focusing on employers and how VR can be of benefit to them is important and a priority for the Division.

## **1. Field Services Policy Manual**

The Division agrees with the SRC's policy related suggestions to include the CFR citations to all major policy sections and making changes to the closure policy for improved readability and clarity.

## **1. Customer Access to Services During COVID-19 Survey**

The Division was not able to act upon all of the SRC's recommendations, particularly conducting telephone or text surveys to improve the response rate for the COVID-19 Access to Services survey. The SRC discussed the feasibility of making contact with customers via phone or text message to increase responses. The Division did evaluate and consider the possibility of this action; however, it was determined that the Division currently lacked the human resources to engage in this strategy, primarily due to high staff turnover/vacancies and the additional challenges of virtual service delivery (COVID).

### **1. Comprehensive Statewide Needs Assessment**

The Division agrees with the SRCs concerns and has already or will prioritize the following: improving the quality of services provided by CRPs, staff retention and turnover which impacts quality service delivery, increase outreach, continue to expand and improve Pre-ETS. These are already current priorities of the Division and will be included, if not already, in the Division's Strategic Plan and the State Plan as goals and/or priorities.

The Division continues to engage the SRC in identifying emerging goals and priorities for the Division. Their voice and engagement provide valuable input necessary to keep the Division focused on relevant and important activities to improve the employment of individuals served by the Division.

### **1. VR Services Portion of the Combined State Plan**

The Division appreciates the dedication and involvement of the SRC Vice Chair and other members who take the time to understand the goals and priorities of the Division. SRC input into the 2022-2023 draft modification of the State Plan have been incorporated into the final version of this plan where applicable. While not all SRC input was germane to this state plan, all themes were retained for a strategic plan and prioritization discussion to be held March 10, 2022. The annual strategic planning and prioritization discussion brings together IDVR administration, Central Office program managers, Regional Managers, and representatives of the SRC.

SRC feedback was supportive of IDVR strategies addressing recruitment and retention challenges, efforts to further align and leverage the workforce development system, and the development of a position for the deaf and hard of hearing.

Following SRC review of the latest draft plan, the Council included topics and suggestions which will be directly addressed at the March 10 session including:

- CRP improvement activities
- Comprehensive services to individuals with MSD
- Expanding partnerships
- Pre-ETS expansion and improvement
- Recruitment and retention issues
- Services to business/Business relations coordination

## **Annual Report**

The Division appreciates and values the contributions of the SRC members in preparing the Annual Report. The Division believes the report has seen steady improvements because of their suggestions and involvement.

*3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.*

The Division was not able to act upon all of the SRC's recommendations, particularly conducting telephone or text surveys to improve the response rate for the COVID-19 Access to Services survey. The SRC discussed the feasibility of making contact with customers via phone or text message to increase responses. The Division did evaluate and consider the possibility of this action; however, it was determined that the Division currently lacked the human resources to engage in this strategy, primarily due to high staff turnover/vacancies and the additional challenges of virtual service delivery (COVID).

*b. REQUEST FOR WAIVER OF STATEWIDENESS*

*When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:*

- 1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;*

Waiver of Statewideness

IDVR is requesting waivers of statewideness for cooperative agreements with:

1. Various Local Education Agencies (LEAs) across Idaho and
2. Idaho Department of Correction (IDOC).

All funds made available to IDVR across these agreements are certified non-federal funds.

Note: IDVR utilizes the last completed SFY/PY for projection estimates. SY2021/PY2020 data is the most current completed year available to report.

Local Educational Agency Agreements:

IDVR currently has 11 School to Work Transition (SWT) cooperative agreements serving 50 of the 175 total LEAs across Idaho. These cooperative agreements are solely to facilitate the transition of students with disabilities from K-12 public education into adult life. This transition to adult life may involve any or all of the following goal-oriented activities: post-secondary education, training and job placement, direct placement into appropriate employment (to include supported employment if required), advocacy and any other activities that are relevant to the student and within the scope of IDVR's mission and role. Additionally, IDVR agrees to collaborate with LEAs to provide or arrange for the provision of pre-employment transition services for eligible and potentially eligible students with disabilities who need these services in accordance with 34 CFR 361.48.

Each signed individual agreement with participating LEAs provides for certified non-federal matching funds and further stipulates that IDVR will not provide pre-employment transition services that the school customarily provides under IDEA.

These agreements promote better understanding and convenient access to VR services, including pre-employment transition services, to qualifying students offered through School to Work

Transition, but do not expand the scope of services available statewide (e.g. all services provided under these agreements are available statewide for all students, regardless of the presence of an LEA agreement). The services offered under these agreements include:

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in postsecondary educational programs at institutions of higher education
- Workplace readiness training and
- Instruction in self-advocacy
- All other traditional VR services

These agreements are revised and renewed on an annual basis.

These agreements increase outreach through stronger relationships between the LEA, VR, and individuals with disabilities promoted by a better understanding of services by LEAs where agreements are in place. Enhanced relationships between all parties to the agreement promote an informed transition to traditional VR services and the opportunity for potentially eligible students to participate in Pre-ETS. There are a growing number of students being served under these agreements with a 21.22% increase in PY20 to 1485 students, and participating students are utilizing a greater array of services with 110 fund expenditures rising from \$804,270 in PY19 to \$1,815,717 in PY20.

All state plan requirements, including a state's Order of Selection, apply to all services provided under these cooperative agreements.

Data for each of these 11 agreements are included in the following table, including the LEAs, number of students served, receipt of non-federal funds and VR 110 grant funds (not including match funds). IDVR utilizes the last completed SFY/PY for projection estimates.

#### **LEA Agreement Expenditures for SFY 2021 (Actual)**

Agreement	Students Served (PRE & VR)	Non-Federal Funds Captured	VR 110 Funds Expended
Region 1 Agreement with LEAs: #271, #273	69	\$18,522	\$181,158.55
Region 1 Agreement with LEAs: #83, #84, #101, #272	89	\$18,522	\$60,266.83
Region 2 Agreement with LEA: Lewiston Independent School Dist. #1	35	\$18,522	\$78,244.29
Region 3 Agreement #1 with LEA: Boise Independent School Dist. # 1	132	\$18,522	\$117,275.17
Region 3 Agreement #2 with LEA: West Ada School Dist. #2	156	\$37,044	\$136,578.37
Region 3 Agreement #3 with LEA: Nampa School Dist#131	108	\$18,522	\$121,363.97
Region 3 Agreement #4 with LEAs: #133-137, #221, #363, #370, #372, #373	102	\$18,522	\$91,366.44

Agreement	Students Served (PRE & VR)	Non-Federal Funds Captured	VR 110 Funds Expended
Region 4 Agreement with LEAs: #61, #234, #121, #151, #314, #231, #232, #233, #261, #331, #418, #316, #312, #465	225	\$18,522	\$246,682.15
Region 5 Agreement #1 with LEAs: #25, #52, #55, #58, #381	314	\$18,522	\$485,513.01
Region 5 Agreement #2 with LEAs: #33, #148, #351, #21, #149, #150, #201, #202	63	\$18,522	\$37,866.27
Region 6 Agreement with LEAs: #59, #60, #91, #93, #251, #252	192	\$18,522	\$259,402.28
<b>Totals:</b>	<b>1485</b>	<b>\$222,264</b>	<b>\$1,815,717.33</b>

Idaho Department of Correction (IDOC) agreements:

IDVR has also entered into two cooperative agreements with the Idaho Department of Correction (IDOC) which cover six of the seven IDOC Districts in Idaho, excluding IDOC District 2. The purpose of these agreements is to provide comprehensive Vocational Rehabilitation (VR) services to eligible offenders with disabilities leaving the prison system that have been identified as at risk for recidivism, thus needing more intensive reentry services to promote post-incarceration stability including stable employment.

These agreements promote better understanding and convenient access to VR staff and services to promote the reentry of the offenders into society, with an emphasis on stability and employment. All relevant VR services may be provided, depending upon the need of the individual. The scope of services provided under these agreements may include:

- Vocational Rehabilitation Counseling and Guidance
- Assessment
- Diagnosis and Treatment
- Training services to include, graduate, 4-year college, junior or community college, occupational or vocational, on-the-job, job readiness, miscellaneous, registered apprentice, basic academic remedial or literacy and disability related training
- Information and Referral
- Short-Term Job Supports
- Job Search and Placement Assistance
- Supported and Customized Employment
- Benefits Counseling
- Rehabilitation Technology
- Personal Assistance and Technical Assistance Services Including Self-Employment
- Reader and Interpreter Services
- Extended Services, if applicable and individual meets the eligibility criteria to receive such services
- Supportive services to include, maintenance and transportation
- Other Services

All state plan requirements, including a state's Order of Selection, will apply to all services provided under these cooperative agreements. Both agreements are revised and renewed on an annual basis.

All funds allotted to IDVR via these IDOC agreements are certified non-federal funds. Both signed agreements provide this assurance.

1. IDOC Agreement 1 \$65,607 (Region 1 and 5)
2. IDOC Agreement 2 \$116,029 (Regions 3, 4, 6, 7)

The total receipt of certified non-federal funds from IDOC is anticipated to be \$181,636 for SY 2022. The total number of individuals served in SY2021/PY2020 by both agreements was 693 individuals with disabilities. The Division expended \$160,756 VR 110 grant funds (not including the above listed match funds). The Division anticipates similar projections for the number of individuals services and funds expended in SY2021/PY2020 per these agreements. The Division expended \$342,734.89 in total for this population in SY2021.

Note: IDVR utilizes the last completed SFY/PY for projection estimates. SY2021/PY2020 data is the most current completed year available to report.

- 2. The designated State unit will approve each proposed service before it is put into effect; and*

IDVR will approve each proposed service prior to it being provided.

- 3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.*

All State plan requirements, including order of selection requirements, will apply to all of the cooperative agreements with Local Education Agencies (LEAs) across Idaho and with the Idaho Department of Correction (IDOC).

*c. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM*

*Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:*

- 1. Federal, State, and local agencies and programs;*

The Idaho Division of Vocational Rehabilitation (IDVR) and the following entities have entered into or are developing formal agreements with programs to outline and explain the collaborative relationship between the program and IDVR. The agreements outline some or all of the following: goals, planning processes, information sharing and confidentiality, technology, accountability, service delivery support, cost sharing, annual action plans, duration, amendments, and termination/conflict resolution, when applicable.

The cooperative agreements with agencies mentioned in this section of the state plan were created to allow for more efficient service delivery to those populations under each cooperative agreement. They have allowed for more efficient referral, eligibility determination and collaborative service provision. Customers have benefited from these cooperative agreements



because of the well-established relationships and improved understanding of cross program requirements. Customers also receive more effective referral and expedited service provision because of the established agreements.

IDVR's case management system collects outcome data for individuals served under many of these agreements. The Division has yet to analyze this information for program improvement purposes.

IDVR has the following cooperative agreements:

**Idaho Industrial Commission (IIC):** This agreement outlines the relationship between IDVR and the IIC with regard to persons injured on the job who may also have other non-work-related injuries. The Industrial Commission will be the lead Agency for injured workers in Idaho and will refer them to IDVR when they are unable to return to previous or similar employment due to the work-related injury.

The cooperative agreement with the Idaho Industrial Commission benefits customers who have experienced an industrial injury, covered by worker's compensation law. Customers benefit in terms of access and service provision because of the well-developed relationships fostered by this agreement. Customer receipt of services is generally faster and more streamlined because program staff have strong working relationships and an understanding the requirements of each program.

IDVR has had a long-standing agreement with the Idaho Industrial Commission (IIC). The agreement describes the purpose, responsibilities, and referral process for customer who are industrially injured workers covered by the Idaho Workers' Compensation Law. The Division does not track IIC referrals.

The agreement with Idaho Industrial Commission has been updated as of April 2022 and includes referral procedures for both ICRD and IDVR. Referrals to the Industrial Commission are contingent on application for benefits under Idaho Workers' Compensation Law. Co-enrollment may be indicated where rehabilitation services available under 34 CFR 361 are needed but not available under Idaho Workers' Compensation Law.

Co-enrollment and referrals between the entities has traditionally been low, and the current referral processes detailed in the agreement are sufficient to address the volume of referrals occurring between the entities. Traditionally IIC referred cases are low volume multiple diagnosis referrals including severe and persistent mental health conditions, or individuals who may be waiting on a settlement and need some type of immediate income stream. Additionally, individuals who have settled a claim and are subsequently no longer attached to the commission are then more likely to engage with VR, but these customers no longer fall under the agreement.

Coordination between IDVR and IIC is accomplished through Regional Management attendance of IIC staff meetings. Additionally, IDVR's Administrator has engaged the new director of IIC to help better inform on the services available through the partnership and navigate the intersection between the programs.

**Reciprocal Referral Services between the two VR Programs in the State:** The State of Idaho has two VR programs, the Idaho Division of Vocational Rehabilitation and the Idaho Commission for the Blind and Visually Impaired. The two programs have a Memorandum of Understanding (MOU) to establish guidelines and policies to delineate the services both agencies will provide to individuals with disabilities. Furthermore, this agreement enhances cooperation and collaboration between the

two agencies, improves inter-agency communication, and establishes staff cross-training opportunities.

Customers of both VR programs in the state of Idaho receive comprehensive VR services in a timelier manner. The Division has recently started obtaining co-enrollment data across all WIOA programs. This data will help improve our cross-program referrals and other collaborative efforts. As of the most recent ETA 9169, 4.3% of Title IV participants are co-enrolled in other WIOA umbrella programs. This figure does not consider co-enrollment within Title IV.

**Independent Living:** IDVR is the Designated State Entity (DSE) for the Title VII Part B funds distributed by the Administration for Community Living (ACL). IDVR currently contracts and allocates a percentage of the total grant funds to the following entities:

- Idaho Commission for the Blind and Visually Impaired (ICBVI)
- State Independent Living Center (SILC)
- Living Independence Network Corporation (LINC)
- Disability Action Center – Northwest (DAC)
- Living Independently for Everyone (LIFE)

IDVR projects split based upon percentages agreed to by participating entities and uses prior year expenditures for the following projections.

Anticipated Federal Award Share by Independent Living Program: FFY 2022

SILC	30.0%
ICBVI	24.0%
LINC	23.0%
LIFE	18.0%
DAC	5.0%
Total	100.0%

Anticipated Federal Award Share by Independent Living Program: FFY 2023

SILC	30.0%
ICBVI	21.0%
LINC	24.5%
LIFE	19.5%
DAC	5.0%
Total	100.0%

Part B funds are used to enhance and expand core independent living services.

This agreement is to describe the transfer VR funds for IL activities as outlined in Section 705 and 713 of the Rehabilitation Act of 1973 as amended by the WIOA. This agreement increases the IL centers' ability to provide services to individuals with disability who require independent living services. IDVR does not track services or outcomes as they relate to this cooperative agreement.

**Project Search:** Project Search is a high school transition collaborative effort between school districts, VR, Community Rehabilitation Programs (CRPs) and host businesses. It is an international, evidence-based model which prepares transition students identified as requiring long term

supports for the world of work, thus helping them move into community employment after high school graduation. The Project Search program combines two hours of daily classroom training along with four hours of unpaid internship. These internship experiences are provided in three different eight-week rotations and can include: housekeeping, dietary, laundry, childcare, and equipment transportation. Even though the students may not be hired by the host business, they are better prepared for work and better able to access employment after Project Search completion.

This collaborative agreement describes the roles, responsibilities, and process between all parties involved. Students participate in internships and other Pre-ETS activities in several rotating work sites. Students develop work skills which will increase their employment options at the completion of the program. The Division maintains employment information on all successful outcomes. Forty-one students have participated in Project Search since PY2018, of those 22 students successfully obtained employment after their participation in Project Search.

**Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe):** IDVR entered into one collaborative cooperative agreement with all four federally funded Tribal VR programs in the state. The updated cooperative agreement addresses WIOA requirements, specifically to include address transition services to students and youth with disabilities.

The intent of the agreement is to develop and implement a cooperative system for providing vocational rehabilitation services to eligible American Indians with disabilities and to promote and enhance to the greatest extent possible vocational rehabilitation services like that of those provided by the State of Idaho. IDVR has the basic responsibility to provide rehabilitation services to all eligible customers in the State of Idaho. The Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Paiute and Shoshone/Bannock Tribe, through a Federal Section 121 grant, will work cooperatively with IDVR.

American Indian (or Alaska Native) customers benefit from the enhanced cross program collaboration described in this cooperative agreement. They experience greater access to services in an expedient manner because of the well-developed relationships and increased collaboration fostered by the agreement. IDVR staff are provided cultural awareness and sensitivity training so they are better prepared to engage with shared customers. Customers also receive a comprehensive array of unduplicated service.

Currently outcomes are not being tracked in the Division's case management system. The Division still needs to evaluate a better method for collecting jointly served participants.

**U.S. Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment (VR&E) Program and IDVR:** This cooperative agreement is entered into by the U.S. Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment Program (VR&E), and the Idaho Division of Vocational Rehabilitation with the purpose of ensuring seamless, coordinated, and effective vocational rehabilitation services to Idaho's veterans with disabilities and dependents with disabilities, improving cooperation and collaboration between the two agencies, avoiding duplication of services, improving inter-agency communication, and to establish staff cross-training opportunities.

Veteran customers with disabilities jointly served by VR&E and IDVR receive faster, more streamlined access to services and shared program resources because of the increased collaboration created by this agreement.

Currently outcomes are not being tracked in the Division's case management system. The Division needs to evaluate a better method for collecting jointly served participants.

**Partnership Plus (PPLUS):** Partnership Plus (PPLUS): IDVR has established PPLUS agreements with five Employment Networks (EN's) in and out of the state. The PPLUS agreements facilitate referrals between IDVR and the EN under the Social Security Administration's (SSA) Ticket to Work program. The Agreement defines the responsibilities of each party in working with Social Security beneficiaries (those receiving SSI Supplemental Security Income or SSDI Social Security Disability Insurance benefits). This partnership is created once the beneficiary selects an EN, and the EN accepts the referral. A referral to the EN is made within the first month of stable employment. This agreement establishes the basis for collaboration and coordination between the beneficiary, IDVR, and the EN as the beneficiary transitions from the VR program after closure. The EN will provide continued support on the job, i.e., benefits counseling, reporting earnings to SSA, job retention services, and other types of ongoing support, at no cost to the beneficiary. The EN can help the beneficiary maintain or advance in employment and increase their earnings.

**Idaho Department of Labor as an Employment Network:** The Idaho Department of Labor (IDOL) has revised their PPLUS agreement with IDVR. American Dream Employment Network (ADEN), an administrative EN, has taken over the technical assistance and training of PPLUS for IDOL. The PPLUS agreement describes the referral process between IDVR and ADEN/IDOL under the SSA's Ticket to Work program authorized under the Ticket to Work and Work Incentives Improvement Act of 1999 (P.L. 106-170, Title 1, Subtitle A, 42 U.S.C. 1320b-19 et seq.) and the revised regulations Social Security promulgated under 20 CFR Part 411 that took effect July 21, 2008. The Agreement further describes the responsibilities of each agency in working with Social Security beneficiaries (those receiving SSI/SSDI benefits).

The cooperative agreements with Employment Networks, including the agreement with IDOL, assist those customers who could benefit from additional supports and services needed to maintain their employment. IDVR has experienced low volume referrals to ENs across the state, however IDVR continues to reinforce the value of services provided by ENs for customers who could benefit from additional supports to maintain their employment. IDVR continues to educate staff and works with ENs to market their services to increase the number of referrals. Outcomes are not tracked in the case management system but are tracked by the Central Office Ticket to Work Program Specialist.

**Adult Corrections:** The Division in collaboration with the Idaho Department of Correction (IDOC), has two Memorandum of Agreements (MOAs) to provide a cooperative effort in the delivery of comprehensive vocational rehabilitation services to customers who are involved with the criminal justice system. The goal of the MOAs is to provide IDVR eligible customers who are reentering the community and under felony supervision in the following service areas: Region I Coeur d'Alene, Regions III and VII Treasure Valley area, Region IV Twin Falls and Region V Pocatello area the opportunity of the full spectrum of IDVR services. IDOC will contribute certifiable non-federal funds towards the case service expenditures.

Incarcerated individuals with disabilities who are ready to transition back into society, receive services in a more efficient and timely manner because IDVR staff are collocated in correction facilities per the cooperative agreement. Staff are able to engage with customers more frequently, prior to release. Counselors who work with incarcerated and ex-offenders better understand the probation and parole requirements which can assist individuals with their IPE services and goals and reduce potential recidivism.

Outcomes are tracked in the case management system by caseload. Of those offenders working with an IDVR corrections counselor, in PY2020, 72 incarcerated or ex-offenders successfully obtained employment.

**Transitioning Students with Disabilities:** In collaboration with Special Education and IDEA, as well as federal initiatives, the Division has developed cooperative agreements with schools or school districts in various areas throughout the state to provide comprehensive vocational rehabilitation services to students with disabilities to assist with transition to work. A designated VR counselor and staff member are assigned to a consortium affiliated facility to better serve customers in the respective areas.

The school districts contribute certifiable non-federal funds to IDVR to be used for allowable IDVR case service expenditures per the cooperative agreement. The memoranda agreements cover the following areas of the state:

- Region I Coeur d'Alene - Two Projects
- Region II Lewiston - One Project
- Region III Treasure Valley Special Programs - Four Projects
- Region IV Twin Falls - One Project
- Region V Pocatello - Two Projects
- Region VI Idaho Falls - One Project

It is worth contrasting the services in the regions of the state covered by the cooperative agreements versus those not covered. IDVR counselors are either located in high schools or travel to those high schools participating in the project. This increases accessibility to the students eligible and/or potentially eligible for IDVR services. Counselors maintain a dedicated caseload of transitioning students and youth with disabilities until case closure. Dedicated school to work counselors collocated in schools creates closer working relationships with school personnel, provides for more timely referrals, better support throughout the rehabilitation process, and the expertise that comes with specialization. The arrangement has proved important in developing an excellent working relationship between IDVR staff and school districts across the state.

In school districts not covered by the cooperative agreements, students continue to receive the same level of service provision; however, referrals to IDVR are made by school counselors, special education teachers, or by word of mouth. All of the traditional and relevant activities and services are provided by a general caseload counselor. There are no services offered under the cooperative agreements that are not also made available by counselors providing services in the areas not covered by the cooperative agreements. The counselors who only serve students and youth typically are more knowledgeable and specialized in serving this population.

Students with disabilities benefit from the cooperative agreements IDVR has with LEAs across the state because VR staff are collocated in the when practicable, which results in increased

accessibility and availability to students, parents, and teachers. This enhanced access has increased Pre-ETS to those potentially eligible students and students who wish to apply for VR services. The cooperative agreements serve as the foundation for improved relationships between VR, students, parents, and teachers.

The Division is beginning to see more students reach their employment goal because of the early engagement with teachers, parents, and students. IDVRs case management system does capture employment outcomes for students who apply for VR services. Not all potentially eligible students apply for services, however those that do are also being tracked.

## *2. State programs carried out under section 4 of the Assistive Technology Act of 1998;*

The state program which carries out the statewide Assistive Technology program for Idaho is the Idaho Assistive Technology Project (IATP), housed by the Center on Disabilities and Human Development at the University of Idaho. IATP's goal is to increase the availability of assistive technology devices and services for older persons and Idahoans with disabilities. IDVR and IATP have had a long-term working relationship to assist IDVR customers with assistive technology services and devices, to include VR representation on the IATP Council. IDVR is in the early development stages of formalizing a cooperative agreement with IATP. The components of the cooperative agreement will include coordination and availability of services, the reciprocal referral process, and other programs and resources available through the Idaho Assistive Technology Project.

The collaboration between IDVR and IATP has improved access to AT services and devices for those individuals with disabilities who can benefit from these services. IDVR staff have a linkage directly to AT resources our existing collaborative efforts to include AT assessments, services, and devices from AT subject matter experts. AT services and devices can reduce barriers to employment, allowing individuals with disabilities the opportunity to be more productive and succeed in employment. The Division does not currently track outcomes related to services provided under this agreement. The Division needs to evaluate a method for collecting jointly served participants. The formal agreement with IATP was delayed due to COVID related challenges faced by both agencies. Agreement discussions have recently resumed with the IATP Director with an estimated completion date of September 2022 will be completed by the end of FFY 2020.

## *3. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;*

The Idaho Division of Vocational Rehabilitation does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

## *4. Non-educational agencies serving out-of-school youth; and*

The Division does not currently have any agreements with non-educational agencies serving out-of-school youth.

When indicated, IDVR will engage in a co-enrollment strategy with other WIOA Plan partners, to provide general VR services and disability related supports.

Out-of-school youth (youth age 14-24 not enrolled in a secondary program) are encouraged to complete their high school education or pursue a formal or self-study GED program whenever

possible to increase their options and access to postsecondary opportunities. This includes referral to Idaho Career & Technical Education's Adult Education program (available to those over the age of 16). Idaho Job Corps maintains a partnership with the College of Western Idaho to offer a path to a high school diploma or GED for those age 16-24.

The WIOA Youth program under the Idaho Department of Labor focuses on education, training and employment opportunities for out-of-school youth. WIOA Youth provides an array of services to qualifying youth including dropout recovery services, paid and unpaid work experiences, occupational skill training, leadership development opportunities, facilitation of employer connections, interviewing skills, and mentoring.

The Idaho Division of Vocational Rehabilitation's (IDVR) State Transition Coordinator and Area Transition Counselors meet monthly with the Idaho Youth Apprenticeship Program (YAP) to develop strategies for working together to create options for youth to participate in apprenticeships. The regional YAP staff began meeting with IDVR staff in the areas they serve to educate all IDVR staff about Youth Apprenticeship opportunities, referral process, and to support IDVR staff in understanding the youth apprenticeship process for in-school versus out-of-school youth. The Youth Apprenticeship Program connects people, ages 16-24, to training and careers in Idaho. Building workforce-ready labor requires a collaborative effort among government, business, and education. Youth Apprenticeship provides education, work experience, and access to postsecondary education, training, and certifications.

IDVR is currently working with YAP to serve a student in Northern Idaho in an apprenticeship pilot. We will use what is learned from Northern Idaho to continue to develop more programs. Additionally, IDVR and YAP are providing joint presentations to the community and to students and teachers.

IDVR is also working with Job Corps to develop ways to provide students with access to paid work experiences, work readiness training, and instruction in self-advocacy in addition to attending their Job Corps courses. Our Area Transition Counselors are points of contact with Job Corps to provide these services in both individual and group settings.

Idaho Job Corps offers qualifying youth extensive support for up to two years depending on individualized need. This includes career exploration and education assistance.

The Division will be coordinating with the apprenticeship program under Idaho Department of Labor for the purpose of expanding apprenticeships in the state. As part of this collaboration, the Division will be hiring an Apprenticeship Coordinator that will work as a liaison for IDVR customers with the IDOL Apprenticeship team, including the Youth Apprenticeship (YAP) team and will bring expertise on how employers can support youth with disabilities to be successful in their apprenticeship programs.

Idaho's Disability Employment Initiative grant and the formal agreement IDVR had with the Idaho Department of Juvenile Corrections have ended. Regardless of the presence of formal agreements, these past projects have resulted in better working relationships between these partners.

Numerous regional partnerships take advantage of local resources or serve as referral sources to IDVR to engage out-of-school youth. These resources differ by location with a common theme of providing a mechanism of outreach for out-of-school youth.

### *5. State use contracting programs.*

Idaho Division of Vocational Rehabilitation does not maintain state use contracts with vendors.

At the state level, some non-profit Community Rehabilitation Programs provide skill development and training for individuals with disabilities through the State of Idaho's State Use Contracting program. While many programs providing state use goods do not meet the integrated criteria established under WIOA, the program does generate income for CRPs allowing increased stability of their overall programs with supplemental revenue. Fiscally healthy CRPs are then able to continue operations in their Competitive Integrated Employment divisions. This indirectly benefits those customers of IDVR who require CRP services.

#### *d. COORDINATION WITH EDUCATION OFFICIALS*

*Describe:*

- 1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students*

The following section outlines how IDVR meets the requirements of 34 CFR 361.22: Coordination with education officials.

#### *(a) Plans, policies, and procedures.*

(1) The vocational rehabilitation services portion of the Unified or Combined State Plan must contain plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities that are designed to facilitate the transition of students with disabilities from the receipt of educational services, including pre-employment transition services, in school to the receipt of vocational rehabilitation services under the responsibility of the designated State agency.

(2) These plans, policies, and procedures in paragraph (a)(1) of this section must provide for the development and approval of an individualized plan for employment in accordance with § 361.45 as early as possible during the transition planning process and not later than the time a student with a disability determined to be eligible for vocational rehabilitation services leaves the school setting or, if the designated State unit is operating under an order of selection, before each eligible student with a disability able to be served under the order leaves the school setting.

The Division has developed and maintains policies and procedures for IDVR staff in Section 9 of the Field Services Policy Manual: Pre-Employment Transition. This section contains field guidance under the following categories:

- IDVR Policy: Pre-Employment Transition and Transition Services for Students and Youth outlines Division policy for internal staff and includes sections on Pre-ETS, Service Provision and Collaboration with Schools, Potentially Eligible Students, Pre-ETS services for students, transition services, youth with a disability, student with a disability, IPE development, Pre-ETS services exemption from financial participation, auxiliary aids or



services, and guidance for Pre-ETS delivery under Order of Selection (note: IDVR is not currently under OOS and does not anticipate entering OOS according to current projections). IDVR Policy defines Student with a Disability including age and education requirements within this policy. The earliest a student can engage in Pre-ETS is 14 as agreed to by IDVR and ICBVI. This age was determined through collaboration with our blind agency ICBVI and the state department of education during development of our Interagency Agreement. We determined the start age of 14 because of statewide initiative with CTE that is focuses on middle school. The age is documented in our Interagency Agreement. It has been communicated to IDVR staff through the Pre-ETS Guidance Document.

- IDVR Procedures: Pre-Employment Transition Services: This document is a guide for IDVR staff outlining Pre-ETS Procedures. This guide does outline some contract processes and guides to help IDVR staff understand the differences in how contracts are framed, but all contract requirements and actual contracts are conducted as a separate formal process following all required policies and rules outlined by the Idaho Division of Purchasing (as outlined in individual contracts and designed to meet the requirements of this section). IDVR staff can only approve and authorize services within the context of their position, approval authority, and as outlined in policies and procedures. Processes include: LEA paid work process (with procedures for LEA and IDVR staff), traditional IPE case Pre-ETS processes, pre-case type processes, LEA summer programs, Occupational Preparation Advocacy Lab, CTE Exploration Program, IESDB (LEA) Summer Work Camp and Paid Work Experience, Idaho Parents Unlimited (IPUL) Work of Art, Institutes of Higher Education (IHE) Programs (Summer and School Year sections), Summer Bootcamp, Summer Self-Advocacy classes, Tools for Life, Summer Work Experience, Employer Reimbursed Work Experience (100-hour), 40-Hour individual CRP employer Work Readiness Training and Work Experience, Job Shadows (VR provided and CRP based), Vendor travel for remote and underserved areas, Conover online, The Idaho Transition Institute, and a Pre-Case Checklist guide.

#### Plans:

IDVR maintains multiple documents for the purposes of Pre-ETS planning. These include the IDVR Pre-ETS Strategic Plan, the Statewide Transition Plan (STP), and other relevant transition plans (as needed).

#### (b) Formal interagency agreement.

The SDE, IDVR, and ICBVI have developed a comprehensive formal interagency agreement which meets the requirements of 34 CFR 361.22(b)(1-6) by addressing eligibility criteria, collaborative service provision, consultation and technical assistance, including the programmatic and fiscal responsibilities for each agency, as well as procedures for outreach, application (when required) and early engagement. The latest amended agreement is in effect as of January 2022.

Additionally, the Agreement details that the IPE must be developed, agreed to and signed by the student, or the student's representative, and the VR counselor, as early as possible in the transition process, within 90 days from eligibility and no later than the time the student leaves the school setting, whichever is earlier.

This agreement provides the assurances required for coordination with 34 CFR 397 (Limitations on the use of subminimum wage) for proper notification and documentation requirements when a student becomes known to be seeking less than minimum wage employment. Additionally, the agreement notes SDE and LEA responsibilities to:

- Per 34 CFR 397.31 neither the Idaho State Department of Education nor a local education agency will enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at subminimum wage.

Specific criteria are used to determine which agency (IDVR, ICBVI or LEA) has the primary responsibility for providing and paying for transition related services for students with disabilities. These criteria are based on several factors, including the purpose of the service, which entity customarily provides the service, and program eligibility (per 34 CFR 361.22(c)).

**IDVR Pre-Employment Transition Highlights.** The Division has developed Pre-ETS implementation strategies to provide services at the following levels, including all required pre-employment transition services (job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in postsecondary education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy). The Division has continued to modify and improve these strategies, including the coordinated and authorized services, as service delivery and partnerships evolve. For example, the Division has developed numerous Memorandum of Agreements (MOAs) with various Local Education Agencies (LEAs). These include contracting with educators to provide a Self-Advocacy curriculum for students previously developed through a partnership between the Idaho State Department of Education, IDVR, an Idaho LEA, and the National Technical Assistance Center on Transition (NTACT). The Division has also developed MOAs to provide students with an opportunity to participate in a paid work experience while earning summer school credit.

The Division has also improved coordinated activities by having our VR Counselors work collaboratively with local school personnel to develop effective referral and outreach strategies to maximize opportunities for students with disabilities to participate in Pre-ETS activities. These strategies also include opportunities for students who are receiving accommodations under Section 504 of the Rehabilitation Act. VR Counselors are attending numerous IEP meetings and are working with districts to develop a better process for inviting VR counselors to IEP meetings. In addition, VR Counselors are working with districts to coordinate pre-employment transition services. VR Counselors are working with LEAs to provide career fairs and career mentoring.

IDVR also now has three area transition counselors (ATCs) whose focus is to increase the number of students receiving pre-employment transition services and to increase the number and types of services that are available to students. They use our Power BI data to evaluate where we are low in referrals or have limited student involvement in Pre-ETS. They specifically target service provision in these areas; these are largely rural areas. Additionally, they are attending an increased number of IEP meetings to assist with coordinated services. One counselor covers northern Idaho, one cover southeast and south-central Idaho, and one covers southwest Idaho.

The ATCs have also worked hard to develop strong working relationships with counselors and within the schools. The ATCs have provided presentations to many school districts (both virtual and in-person) where they discuss various services that are available to the students and to discuss

the referral process. They have also provided informational group meetings with parents and students. The ATCs have also participated in many Pre-ETS planning sessions with schools that were identified by IDVR as underserved/underrepresented for their size. These planning sessions have been productive and have increased student engagement from those schools. The ATCs have meetings with special education directors to identify their perception of student needs to best assist with the transition out of high school. Additionally, these ATCs hold discussions to better gauge perceptions of the VR/school alliance and how we can further strengthen this relationship.

The ATCs have also worked with the school-to-work counselors closely. ATCs meet with SWT counselors on a regular basis to brainstorm ideas, address emerging issues, and discuss Pre-ETS in general. They have worked with several staff to set up WBLE for rural LEAs. Additionally, ATCs attended several events with SWT counselors for deeper engagement with school districts with projects such as Reality Town, school presentations, a tour of multiple CTE programs, career fairs, or observing programs at the LEA. They have also actively engaged with LEAs to help start 18-21 programs with plans to expand this initiative to other schools.

Finally, the ATCs have worked with new IDVR staff to introduce them to the world of Pre-ETS. This early staff training is important as Pre-ETS is a major part of the VR process. The ATCs have also been the main point of contact for many schools when a region experienced significant staff turnover. This has been an important task as we work to maintain positive relationships with school districts and not lose the progress, we have made this year.

The Division also works with the State Department of Education, the Idaho Commission for Blind and Visually Impaired, LEAs, Institutes of Higher Education (IHEs), and the Council for Developmental Disabilities to put on a Transition Institute for LEAs and VR staff. The Institute is modeled after NTACT Taxonomy for Transition Programming. The Taxonomy for Transition Programming provides solid practices identified from effective programs and evidence-based predictors of post-school success for implementing Pre-ETS and transition focused education. This Institute allows collaborative planning between LEAs and VR. Teams, at the regional level, discuss what transition/pre-employment transition services are available to students and what services are needed by students based on each district. Teams then create plans to help increase the necessary services for students with disabilities.

The Division has strong relationships with education agencies throughout the state, including formal interagency agreements with several Local Education Agencies (LEAs), a comprehensive formal interagency agreement which addresses collaborative service provision with the State Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI).

The Division and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency and identifies the minimum age for service delivery to students with disabilities. The minimum age is 14 for service delivery to students with disabilities.

The pre-employment transition services will be provided to students with disabilities who are potentially eligible or eligible for VR services. This agreement was formalized and signed in November 2020. The agreement is reviewed annually for relevance and will be amended by mutual consent as needed.

Lastly, the Division has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division's Pre-Employment Transition Plan. The goal on the statewide plan is to develop systems for effective collaboration between students, families, secondary and post-secondary educators, rehabilitation counselors, Career and Technical Education (CTE), and service providers to provide quality transition activities and pre-employment transition services to students across Idaho. The Statewide Transition Plan is further detailed in section 2B.

*2. Information on the formal interagency agreement with the State educational agency with respect to:*

*A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;*

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains several provisions designed to promote communication and the sharing of technical expertise in transition planning.

The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment.

The agencies agree to:

1. Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
2. IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
3. IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
4. IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
5. IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
6. IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
7. IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

8. IDVR and ICBVI counselors will help students and youth with disabilities develop and participate in Pre-Employment Transition services, including work-based learning opportunities, provide information, support, and guidance to transition students, parents, and schools to promote effective transition services, help eligible students develop an IPE, plan and promote the use of Pre-ETS and transition services, identify and help students and their families access other appropriate resources, help students obtain technology evaluations, recommended assistive technology, and training in the use of purchased equipment, when appropriate.
9. All Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provision under this cooperative agreement.

#### Idaho Interagency Council on Secondary Transition:

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. IDVR continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of students with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing IDVR's mission at the state and local level. Members include the Idaho State Department of Education (SDE), Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for the Blind and Visually Impaired (ICBVI), Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project, Idaho Health and Welfare, Juvenile Corrections, Department of Correction, and LEAs.

*B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;*

**Statewide Transition Plan** - IDVR, the State Department of Education (SDE), Idaho Parents Unlimited, Council on Developmental Disabilities, Boise State University, University of Idaho, West Ada School District, Lake Pend Oreille School District, and Bonneville School District, have developed and implemented a statewide secondary Transition Plan with support and assistance from NTACT (National Technical Assistance Center on Transition). The goal of the plan is to increase referral and connection to evidenced based transitions and postsecondary services by ensuring broad student/family awareness of resources and opportunities, and mapping pathways for students of differing needs that allows for effective hand-off from one service/agency to the next.

Expected outcomes include increased provider understanding of CTE programming and pathways; increased provider understanding of DHW services and processes for transition from student to adult services; increased number of students receiving pre-employment transition services or needed transition services; continued collaboration at the local level because of the transition institute, and more students participating in post-secondary services, with the ultimate goal of promoting higher quality employment outcomes for Idaho students with disabilities.

This is done in various ways. The planning of activities which may be joint activities occurs through three main avenues.

- First at the central office level, the transition coordinator works with LEAs and IHEs to plan different Pre-ETS that will be available to student either during the school year or summer. Contracts for these services outline the requirements and expectations for the service. Dates of the summer programs will be set through discussion between the LEA and the Transition Coordinator. Dates during the school year will be determined through discussion with the LEA and the IHE. Either a local VR counselor or an ATC will assist in setting these dates and times.
- Second, the ATC team promotes appropriate planning and service provision within their designated areas. The ATC will work with the LEA to determine types of service need, when the service can be provided, and who (either IDVR staff or a contractor) will provide the service.
- Finally planning of activities may occur at an IEP meeting, IPE meeting, or individually scheduled meeting with IDVR staff. VR counselors will work with the student and family during one of these times to determine what if any Pre-ETS are needed and will plan accordingly.

IDVR counselors attend hundreds of IEP meetings statewide each year where they discuss Pre-ETS and VR services with students and families. IDVR also created a one-page Request for Pre-Employment Transition Services form that is easy to complete to receive Pre-ETS. This makes the process for receiving Pre-ETS quick and easy for students and families. However, students still meet with a VR counselor when completing the form. During this time, the counselor discusses the VR program and what additional services can be made available to the student when they fully participate in the VR program. Additionally, while receiving Pre-ETS, students are provided information about the VR program and how VR can support students with employment and educational goals.

IDVR also conducts significant outreach as part of collaboration with LEAs to discuss both Pre-ETS and the VR program. They are also provided information on the VR eligibility process, so they can provide this information to families. The Transition Coordinator attends regional special education directors' meetings to present on Pre-ETS and VR services. IDVR also presented at the 504 coordinators meeting, the superintendents meeting, and the statewide Transition Institute. IDVR provides numerous presentations at Tools for Life, which is a conference that students with disabilities attend. Presentations include information on Pre-ETS, VR services, and the VR eligibility process.

Lastly, IDVR developed an informational packet for students and families that can be shared by teachers at IEP meetings when the VR counselor is not able to attend. IDVR developed two videos that have been shared with teachers on Pre-ETS and the VR program as well as the eligibility process for VR. These videos are maintained on the VR website. These videos disseminated to LEA staff via the State Department of Education's Transition Coordinator.

Furthermore, the formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains several provisions designed to facilitate the

development and implementation of Individualized Education Programs (IEPs). The agencies agree to cooperate in the development of transitioning students' Individualized Education Programs (IEPs) and any relevant Individual Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

*C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;*

IDVR has continued to participate in agreements with many LEAs across Idaho, initiated prior to WIOA, however these agreements do not afford unique services to students in these districts. In other words, Pre-ETS and transition services offered under these agreements do not increase services or expand the scope of services over any other political subdivision of the state. All Pre-ETS and transition services are offered statewide to all LEAs regardless of agreement status. IDVR has staff assigned to all public high schools across the state.

**Idaho State Department of Education (SDE) - Secondary Transition:**

Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for Blind and Visually Impaired (ICBVI), and the State Department of Education (SDE) agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

- Pre-Employment Transition Services will be provided to students with disabilities who are potentially eligible or eligible for VR services beginning at the age of 14.
- Roles and responsibilities of each agency, including which agency is state lead
- Financial responsibilities of each agency, including the purchase of Assistive Technology
- Procedures for outreach, consultation, training, and technical assistance
- Transition planning
- Referral process for students with disabilities to the appropriate VR program
- Data release and data sharing
- Dispute resolution
- Prohibition on entering into an arrangement with an entity holding a 14(c) special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.
- Coordination and documentation requirements under section 511

IDVR has created a Youth Subminimum Wage Document Requirements Checklist which includes the documentation requirements and responsibilities under Section 511. Various requirements are detailed in the top-level checklist for youth, including the requirement for a transition or Pre-ETS service to be completed prior to youth verification of Career Counseling and Information and Referral (CCI&R) under Section 511. The Transition Services Documentation and Checklist details LEA requirements for documenting provision of a transition service. Finally, the Youth Career

Counseling Verification Requirements section outlines areas and responsibilities of IDVR in ensuring regulations are met ahead of providing verification of receipt of CCI&R.

### **Section 511 Subminimum Youth Checklist**

The following steps must be completed before IDVR can provide **verification** of Career Counseling and Information and Referral to Youth Seeking Subminimum Wage Employment

1. The provision and documentation of transition services or pre-employment transition services (a. or b. must be completed)
  - a. Transition Services Documentation Checklist Completed
  - b. Pre-employment Transition Services Documentation Checklist Completed
2. Application for VR services AND one of the following (a. b. or c. must be completed)
  - a. Ineligibility Determination Checklist Completed
  - b. Closure after an Approved IPE Checklist Completed
  - c. Informed Choice Not to Pursue Competitive Integrated Employment Form Completed
3. The provision of Career Counseling, and Information and Referral Services (ALL must be completed)
  - a. Youth Career Counseling Verification Elements Signed by Counselor
  - b. Information and Referral Packet Provided to Youth
  - c. Career Counseling, Information and Referral Youth Verification Form for Stated Subminimum Employment Goal Completed
4. Once all of the preceding steps have been satisfied, verification of CC/I&R can be provided to the youth and they would be able to legally work for less than minimum wage. The 511 Subminimum Youth Checklist only has to be completed once. After the youth completes this process, they would engage in group sessions at the 14c to meet ongoing requirements for CC/I&R for youth.

### **Section 511 Transition Services Documentation Checklist and Cover Sheet**

34 CFR § 397.30 outlines the responsibilities of local educational agencies to youth with disabilities who are known to be seeking subminimum wage employment. All elements of this form must be completed in order for the checklist to be considered valid evidence of the completion of transition services for the purposes of satisfying Section 511 requirements of the Workforce Innovation and Opportunity Act.

1. (To be completed by the Local Education Agency): The documentation of completion of appropriate transition services for a youth with a disability under IDEA
  - a. This can be transmitted in the form of an Individualized Education Plan, but must contain at a minimum (please verify the following are contained in this release):
    - i. Youth's name
    - ii. Description of the service or activity completed
    - iii. Name of the provider of the required service or activity



- iv. Date required service or activity completed
- v. Signature of educational personnel documenting completion of the required service or activity
- vi. Date of signature documenting completion of the required service or activity
- vii. Date and method (e.g., hand-delivered, faxed, mailed, emailed, etc.) by which document was transmitted to IDVR
- viii. A cover sheet that itemizes the documentation that has been provided to the VR program regarding that youth (completion of the elements above satisfies this requirement)
- ix. Verification that the educational agency will keep a copy of all documents sent to the VR program
- x. Signature of the individual transmitting this documentation

2. (To be completed by Vocational Rehabilitation):

- a. Verification that VR has filed a copy of this information
- b. Verification that this information has been provided to the youth

### **Youth Career Counseling Verification Elements**

Prior to initial verification of CCI&R for youth known to be seeking subminimum wage employment, IDVR must ensure counselors providing the service address the following elements of the VR process including a discussion of competitive integrated employment and services available at VR to assist the individual in making an informed choice whether or not to continue pursuit of employment with a 14(c) certificate holder.

1. Self-advocacy, self-determination, and high expectations

- a. Identify the individual's desires for employment including type, pay, hours, benefits, etc.
- b. Ensure informed choice

2. Review of any assessment information available

- a. Primary employment factors
  - i. Strengths
  - ii. Interests
  - iii. Abilities
  - iv. Capabilities
  - v. Resources
  - vi. Priorities
  - vii. Concerns
  - viii. Informed Choice
- b. Person-centered planning
- c. Marketable skills
- d. Soft skills (current and where development is needed)

3. Use of labor market information

- a. In-demand occupations
- b. Job exploration

- i. Education and experiential requirements
  - ii. Pay
  - iii. Hours
  - iv. Functional capacity requirements
  - v. Career pathways
- c. Electronic resources and navigation fundamentals

#### 4. SSA Benefits Planning

When engaging in career counseling with individuals with disabilities, rehabilitation professionals should ensure that they are aware of cultural differences and that they discuss the available options such as supported or customized employment. A discussion of the need for assistive technology or reasonable accommodation on the job is important to maximize the potential for success. It is helpful to assess the individual's support system and to provide information on available resources for the individual.

A completed signature sheet (signed by the customer and VR counselor) affirming that the elements of Career Counseling have been discussed with the customer in the course of the provision of Vocational Rehabilitation Counseling and Guidance.

The current agreement establishes the following roles and responsibilities for the involved parties:

#### **The Idaho State Department of Education (SDE) agrees to:**

- Assume the role of lead agency in facilitating interagency planning with LEAs and implementing educational programs and transition services for students with disabilities from high school to post-high school services.
- Support LEAs in their efforts to write IEPs using an outcome-oriented focus and to coordinate transition activities for each IEP eligible student, beginning no later than the IEP created before the student turns age 16 years old (earlier if appropriate), and to address future student needs in the areas of post-secondary education, vocational training, employment, and adult living and communication participation, including assistive technology.
- Support LEAs to collaborate with the student and the family to plan and provide educational services to meet individualized educational objectives, which are documented on an IEP.
- Support LEAs to work in partnership with the student, the student's family, and other community resources to coordinate services within the community.
- Support LEAs to provide ongoing information to the student and the family about the student's educational development.
- Invite IDVR and/or ICBVI to provide information regarding their services, including their role as an IEP team member to school district personnel, students, and their families.
- Invite IDVR and/or ICBVI counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred to IDVR and/or ICBVI for rehabilitation services, or earlier if appropriate.

- Work with IDVR and ICBVI Vocational Rehabilitation (VR) counselors to identify a process for such counselors to provide input and participate in the development of a student's IEP, including pre-employment transition services, when appropriate.
- Identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan (Rehabilitation Act of 1973), or students with disabilities (e.g., physical, medical, or visual, etc.) who are not eligible for special education services, to IDVR and/or ICBVI for pre-employment transition services and/or vocational rehabilitation services.

**Idaho Division of Vocational Rehabilitation (IDVR) and Idaho Commission for the Blind and Visually Impaired (ICBVI) agree to:**

- Agree to establish the age of 14 to begin working with students with disabilities.
- Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
- IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
- IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
- IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video/telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
- IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

- All Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provision under this cooperative agreement.

*D. Procedures for outreach to and identification of students with disabilities who need transition services.*

Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for Blind and Visually Impaired (ICBVI), and the State Department of Education (SDE) currently have a formal cooperative agreement.

The agreement stipulates that the vocational rehabilitation agency will initiate outreach and work with the LEAs to identify potential students with disabilities who need pre-employment transition services and VR transition services for students aged 14-21. This involves informing the student, or when appropriate their parent or legal guardian, as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures, and the scope of available VR services, to include pre-employment transition services.

The Division has also participated in a series of meetings in communities across Idaho including key stakeholder engagement through a series of regional special educator meetings, statewide administrator meetings, the Statewide Transition Institute, Tools for Life with parents, students, and educators, Idaho Parents Unlimited, Idaho Interagency Council on Secondary Transition, and continues ongoing discussions on student outreach with the Idaho State Department of Education.

The Division also developed a Transition Leadership Team. This team has members from each of the eight regions. These leaders provide outreach across the state.

Additionally, IDVR counselors and the Area Transition Counselors have worked with educational counterparts to significantly increase the number of potentially eligible students receiving pre-employment transition services and increase referrals for the VR program after seeing a decline due to COVID-19. Finally, in 2019 IDVR staff, the State Department of Education, the Idaho Parents Center, Idaho Educational Services for the Deaf and Blind, WINTAC, and NTACT worked to create a strategic plan for pre-employment transition services in Idaho. Although this plan was meant to be a two-year plan, with the intrusion of COVID-19 it was determined to review and renew the plan in 2022 to allow time to complete the activities currently indicated on the plan. The first goal developed by the team was to increase internal (VR staff) and external (school districts, parents, students, community partners) clarity and messaging regarding VR process and how Pre-ETS fits into the overall continuum of VR services. The following action steps were created to achieve this goal:

- Create a process to address information sharing between school and VR counselors
  1. Service request form
  2. IEP
  3. 504
- Develop materials to share information about VR services with parents and schools
  1. Pre-ETS
  2. VR Services

- Options for VR Counselors to participate in the IEP process by
  1. Providing information about services
  2. Developing services to address student goals/needs
  3. Creating a timeline for initiating referral/eligibility
- Create training and materials that will increase students' understanding about the VR process and services
- Complete the internal Guidance Document regarding Pre-ETS to be used by IDVR staff
  1. Accountability Measures- Outcomes for Students
  2. Develop a continuum of services reflective of Pre-ETS and Transition Services
- Create opportunities and materials to use with families to increase their understanding of expectation of work and VR Services

The second goal is to strengthen cross agency partnerships to increase collaboration in development and implementation of Transition Services. The following action steps were created to achieve this goal:

- Review and adjust data collection that will improve ability to better inform decision making
  1. Work with SDE to obtain break out of schools, # of students on IEP and 504
  2. Identify additional data points and how to use them
  3. Communicate to the VR field staff how to use the new data points
  4. Share IEPs using a new system
- Regional managers are informed and engaged in how they can support VR Counselors in providing Pre-ETS and Transition Services.
  1. Identify strategies to include Regional Managers
- Outreach strategies to rural schools are identified with steps to address student participation
- Outreach strategies identified for juvenile justice and Foster Care.

#### *e. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS*

*Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.*

IDVR does not establish cooperative agreements with private nonprofit vocational rehabilitation service providers. Services are purchased on a fee for service basis. IDVR does have cooperative agreements with several nonprofit CRPs for the coordination of services provided by Employment Networks for individuals who are Social Security beneficiaries who are Ticket holders. These cooperative agreements describe the coordination between both agencies.

IDVR maintains a Community Rehabilitation Providers (CRP) portal on the Division's website. The portal hosts communication relevant to CRPs and IDVR's CRP Manual. This Manual was first issued

in January 2019 and incorporates significant input solicited from CRPs. The CRP Manual contains information on:

- Service Billing Criteria and Process
- Service Definitions
- Overview of the On-Site CRP Monitoring Review and Corrective Action Process
- Definition of Remote and Underserved Areas where IDVR supports travel due to lack of local services in identified areas
- CRP Services Crosswalk to better align services under WIOA
- Appendix information on the initial pilot for Customized Employment including rates and milestones for that pilot

The manual is intended to serve as a living document which will be updated over time, as needed, with input from CRP stakeholders. A new version of the CRP Manual is tentatively slated to be released July 2022. IDVR has already collected CRP comment in late 2019 for Manual improvements. Planned iterations of the guide include:

- Examples of completed referrals/sample reports to promote quality referrals from VR staff and reports from CRP staff
- Modified monitoring protocol to align with WIOA priorities
- CRP onboarding requirements (accreditation, insurance, and prerequisites to ensure a baseline of quality and accountability)
- Updated fee schedule to better align service compensation and service complexity

CRPs provide specific services for customers based on a fee-for-service or through a specific invitation to bid on a Request for Proposal (RFP). Idaho CRPs must be accredited by either the Commission on Accreditation of Rehabilitation Facilities (CARF) or the Rehabilitation Services Accreditation System (RSAS), follow the process and procedures mentioned in this manual, and undergo periodic monitoring by IDVR to continue a working relationship with the Division. This manual addresses the Idaho Division of Vocational Rehabilitation's state-federal program. The CRP Manual outlines the service billing criteria and process required before the Division will process bills, including prohibitions on billing for multiple customers unless group services are authorized. Group service rates differ from individual service rates and are outlined in IDVR's Fee Schedule. Furthermore, day rates are published for non-community-based assessment where no other options are available in the community. This section also mandates notification in the eventuality of anticipated service discontinuation and prohibits customer abandonment (instead requiring at least 30 days notification for a soft handoff to another CRP ahead of CRP closure in a region). A dispute resolution process including an escalation chain is also established in this section of the guide.

IDVR identifies allowable services under Section Two of the CRP Manual: CRP Service Definitions. Service outlined in this section include the major headings of assessment, job related supports (job search activities, short-term job supports, job readiness training), Pre-ETS (required activities under 34 CFR 361.48(a)(2)), and Supported Employment. Additionally, requirements to document fading and/or skill acquisition for the continue of SE hours are articulated in this section. IDVR is working with CRPs to strengthen understanding of documented progress toward SE stability, and CRPs have requested additional guidance in this area. The Division will issue improved guidance in the tentative July 2020 release of the Manual. Slated improvements include

increased guidance on specific services with a potential incorporation of the agency's benefits planning initiative. The manual covers documentation of stability and transition to extended support and outlines the Youth Extended Services option to provide this service to qualifying youth where no alternate funds for extended support are available.

IDVR is in the process of evaluating the current CRP fee schedule for allowable costs using:

- WINTAC's "Review of Vocational Rehabilitation Agency Rates, Methodology, & Monitoring of Performance for Purchased Service" which includes
  - An evaluation of rates for similar services paid by other SVRAs
  - Federal cost principles at 2 CFR 200.405(a) to align costs to relative benefit
  - Accreditation requirements
  - Payment methods (fee-for-service, performance, contracts)
  - Reporting requirements
  - Monitoring

The Division's 2022 modification of the guide will apply each of these considerations to inform potential fee updates: While the Division's current CRP Manual (January 2019) does address each requirement, the Division's analysis may incorporate innovative practices used by other SVRAs. Currently the Division does not separate rate by complexity of rehabilitation needs but is seeking to remedy this deficiency. The Division is enlisting the assistance of the Idaho Division of Purchasing to inform the analysis of service rates. Novel rates for Customized Employment and Benefits Planning are expected outcomes of this process, in addition to a reconsideration of the agencies total fee schedule. The Division continues to engage in relevant CRP Communities of Practice (e.g. Region X CRP Managers, Supported Employment, and Customized Employment groups), and has engaged with other states to learn more about their contemporary approaches to rate setting, including lessons learned during implementation.

Pre-employment Transition Services (Pre-ETS) agreements including rates are established under a separate process. In areas where volume is sufficient, the Division employs bids/contracts. The majority of contracts are filled in regional population centers, however when an area has no contract (rural and remote Idaho), or all slots are filled for a contracted group, the Division employs individual Pre-ETS provision at existing hourly rates to ensure the availability of Pre-ETS,

IDVR issues an annual report of CRP performance, the Community Rehabilitation Partner Employment Report (CRP-ER) process which produces the following elements by CRP and region:

- Number of CRP Provided Employment Services
- Employment Outcomes with CRP involvement in closure
- Average Hourly Wage of placements
- Average Hours Worked
- Average Annual Earnings
- Percentage of Employer Sponsored Benefits
- OES employment outcomes by category
- Primary impairments served by percentage of total served
- Percentage served within age strata

The CRP-ER is disseminated to CRPs annually and used by VR staff to assist with informed choice of CRP when selecting a provider for planned services. Reports are issued for general CRP services, and for Supported Employment (only) service paths to better identify performance across these groups.

*f. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES*

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

Supported employment means competitive integrated employment (CIE), including customized employment (CE), or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward competitive integrated employment that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant disabilities. SE can be provided by VR for a period of time not to exceed 24 months, unless the VRC and customer jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE service are restricted to those customers assigned to the Most Significant Disability (MSD) category. The Disability Priority Page in AWARE is used to document the justification of priority category assignment. The category assignment is also displayed on the eligibility determination. A brief breakdown of severity categories follows:

**Severity of Disability Priority Categories**

Priority 1 – Most Significant Disability (MSD)

- Meets criteria for SD; **AND**
- Experiences severe physical or mental impairment that seriously limits **three or more** functional capacities (such as mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, and work skills) in terms of an employment outcome; **AND**
- Requires multiple primary IPE services over an extended period of time

Priority 2 – Significant Disability (SD)

- Receives Social Security Disability Income or Supplemental Security Income.
- OR all of the following:**
- Meets criteria for Disability (D); **AND**
  - Experiences severe physical or mental impairment that seriously limits **one or more** functional capacities (such as mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, and work skills) in terms of an employment outcome; **AND**
  - Requires multiple primary IPE services over an extended period of time



### Priority 3 – Disability (D)

- Has a physical or mental impairment; **AND**
- Has a substantial impediment to employment as a result of the impairments; **AND**
- Who can benefit in terms of an employment outcome from the provision of vocational rehabilitation services.

Furthermore, SE is indicated for individuals for whom CIE has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability; and because of the nature and severity of their disabilities, need intensive supported employment services and extended services after the transition from support provided by IDVR in order to perform this work.

A Comprehensive Assessment of Rehabilitation Needs (CARN) must contain information supporting a need for SE and ES prior to engaging a customer in SE services

Any additional assessments/evaluations purchased by IDVR to determine this need should be conducted in an integrated setting to the greatest extent possible.

For the purposes of this policy, SE refers to support services (like job coaching) provided after placement and before the individual reaches initial stability, and prior to utilization of extended services (long-term supports).

Extended Services (ES) are those services, including Youth Extended Services (YES), provided after the assessment of initial stabilization when required for an individual to maintain employment (to sustain employment stability). IDVR limits the provision of extended services exclusively to youth.

Youth Extended Services (YES): WIOA requires IDVR to make YES available when youth have no comparable ES resources available in the community. YES can continue to be provided until: Comparable benefits become available (External funders are identified) OR YES is provided for four years OR The individual reaches the age of 25 and no longer qualifies under the definition of 'youth'. The Division does not provide Extended Services to customers 25 or over as this is an explicitly prohibited activity under WIOA. Youth extended services are only available to youth with most significant disabilities using Titles I and VI funding; and supported employment services are only available to individuals with most significant disabilities.

Supported Employment services under IDVR are only offered by qualified providers as identified in section (e): Cooperative agreements with private/nonprofit organizations.

IDVR is committed to the advancement of opportunities for Idaho citizens with disabilities, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. IDVR has established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program. This program is funded through State appropriations only. The primary service providers for long term supports under the three main funding sources are CRPs.

IDVR utilizes the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The Division will continue to work closely with each program overseeing these resources to streamline our referral process and improve utilization of this external source of extended services funding. The following provides more detail on the working relationship between each ES entity and IDVR.

IDH&W provides the following guidance on extended services under IDVR's Health & Welfare banner:

The Supported Employment Agency Recommendation must be completed by the Idaho Division of Vocational Rehabilitation (IDVR) when transitioning from vocational rehabilitation services or by the Supported Employment Agency (Community Rehabilitation Provider) identified on the plan or addendum. Documentation must include:

- Amount of Service
- Level of Support Needed
- Employment Goals
- Transition Plan

IDVR provides funding for job development services and initial job coaching through a Community Rehabilitation Provider (CRP) agency. The length of time needed for job development varies depending on the individual. As soon as the person has become employed, it is critical to work quickly to ensure there is no gap in the individual's job coaching support in the workplace. The CRP will communicate to the Service Coordinator/plan developer that the participant has been hired so planning for transition to Medicaid-funded Supported Employment services [extended services] can begin. An Employment Agency Recommendation form has been developed to help with the transition process. It includes information from the CRP agency about the participant, their job tasks in the workplace, and a recommended level of service needed by the participant. This information will be used by the plan developer to complete an addendum to the ISP. A transition meeting will be called and facilitated by the Vocational Rehabilitation Counselor. This meeting should include the Service Coordinator/Plan Developer, guardian, and any other identified members of the Person-Centered Planning team to ensure all parties understand the shift to Medicaid Waiver Supported Employment and any signatures can be gathered as needed for addendum or plan development. IDH&W refers to CARF and RSAS (or equivalent) accreditation requirements in order to receive waiver funding.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider. These providers are approved by the EES program administrator on a case-by-case basis. All EES approved providers are also CRPs which are initially approved as CRPs under IDVR's accreditation requirement.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, IDVR will utilize VR funds for the required timeframes or until the funding becomes available for the long-term support.

The Division has developed policies to ensure that Youth Extended Services (YES) can be provided up to four years as needed for IDVR customers under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are

unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, the Division will continue to support YES with Title I funds, as required by WIOA, and will continue to leverage other sources of extended services. YES funds are considered only when external sources of extended services funding are immediately unavailable and would unnecessarily interrupt the continuity of services.

IDVR supports the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE customers. Natural Supports are supports and services typically available to other employees OR supports created to provide supports through people or other resources typically available in the work, home, and community environment.

Stakeholder commitment for Natural Supports include a Plan for change and the Division encourages a written commitment by the individual providing NS, including contact information for a soft handoff in the event a support loss is anticipated.

The following must be satisfied before VR can close an SE case successfully:

- The individual must have completed SE services and is no longer receiving VR funded services including extended services for youth under VR (those receiving YES remain an open case in the VR system).
- The individual has maintained employment stability for a period of 90 days after transitioning to extended services.
- The job meets the definition of CIE.
- The job is consistent with the vocational goal specified in the IPE.
- At the end of the 90 days the customer and VRC agree that the customer is performing well in employment (a lack of employer agreement would indicate instability).
- The individual is informed, through appropriate modes of communication, about the availability of Post-Employment Services.

#### *g. COORDINATION WITH EMPLOYERS*

*Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:*

##### *1. VR Services; and*

IDVR continues to provide coordination of employer related outreach efforts within the Division and coordinated services under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners. IDVR continues to evolve services provided to business and has plans for the continued growth and expansion of the business relations team, additional training for IDVR staff, increase the array of services provided to business, as well as improving the coordination services to business with WIOA plan partners.

IDVR continues to engage in coordinated business services internally through the Business Engagement Leadership Team (BELT). This team continues to be comprised of at least one IDVR staff representative from each region with the activities of the team directed by the Business Relations Manager. Regional Manager representation is present within the team with two of eight Regional Managers participating in a supportive role.

IDVR completed strategic planning sessions in the fall of 2020 to identify the next steps needed to further develop and increase agency performance in serving business customers. The following groups were represented in this process:

- IDVR including Vocational Rehabilitation Counselors, Regional Managers, Vocational Rehabilitation Assistants and Central Office personnel.
- Idaho Commission for the Blind and Visually Impaired personnel,
- State Rehabilitation Council members,
- Representative from the Workforce Development Council

The strategic planning sessions occurred across four different sessions where the agency's business engagement activities were discussed, evaluated, and identified needs were prioritized. Following the strategic planning sessions, the information gathered was compiled and summarized into a working plan.

The goals of the developed working plan identified various areas of focus over the next five years to include but are not limited to:

1. Implementation of minimum performance expectations for each IDVR job category identified,
2. Increase staff competency when connecting with business and providing services,
3. Develop a communication plan for business engagement,
4. Establish the Division as a valuable resource to business
5. Develop a strategy for completing business engagement activities with outside agencies and partners, and
6. Increase overall agency business engagement performance.

Significant Division progress towards these goals has been made since the development of the working plan.

IDVR has revised the identified job descriptions to include business engagement into the job classification descriptions. Additionally, Regional Business Engagement plans were developed and implemented with an outline of goals for business engagement which focus on the utilization of a team approach within each region that allows staff to participate in business engagement activities in various ways leveraging their individual strengths.

Division staff competency has been increased through addressing training needs at the regional level as identified in each Regional Business Engagement plan, as well as training delivered by the Business Relations Manager. Training needs for the BELT have been identified at a regional level by the Business Relations Manager based upon review of regional performance and self-reported staff needs. Additionally, a formal training outline has been developed for new staff.

A Division communication plan is being developed to promote better quality and utilization of business engagement information. In line with the plan, an internal Employer Information page was created to house business information and promote data accessibility for Division staff. Additionally, periodic updates from the Business Relations Manager are provided to individual regions. Furthermore, the Business Relations Manager has completed visits to each region to learn more about localized needs.

The Division continues to strive to become a dependable and useful resource for business. The Division hosts 'Jobs in Idaho' page as an employer recruitment resource. Additionally, the Business Relations Manager conducts a business needs assessment to better tailor planning to achieve the Division's business goals. To this end, the Division has implemented Business Spotlight Sessions which allow businesses a platform to share information about their business and their needs in a group setting. Business Spotlight attendees include IDVR, ICBVI, DOL, Department of Veterans Affairs, Oregon Division of Vocational Rehabilitation, Oregon Commission for the Blind, Washington Division of Vocational Rehabilitation, and Utah Division of Vocational Rehabilitation staff.

IDVR is striving to increase customer outcomes through a business apprenticeship strategy. IDVR will be hiring a dedicated Apprenticeship Coordinator to further develop this service to business as a collaborative pilot in conjunction with the Idaho Department of Labor Apprenticeship team, and the Idaho Department of Correction to ensure these services meet the needs of business, while expanding the quality and scope of career opportunities available to IDVR customers. IDVR has initiated discussions on the apprenticeship development program with businesses and is working to connect interested businesses with an apprenticeship support team.

The Division has developed strategies to increase the unified approach for completing business engagement activities with outside agencies and partners including but not limited to:

- Significant engagement with the One-Stop teams across Idaho with WIOA partners
- All IDVR staff completed IDOL's Technical Assistance Training for Unified Business Services with other Idaho WIOA business leads.
- Interfacing with other states to gain best-practice guidance on Business Engagement approaches. Partners include Washington VR, Utah VR, Oregon VR, and Oregon Blind all participating to promote better services to businesses operating with a multistate footprint.

Due in part to the efforts describe above, Idaho has realized an increase in the variety and quantity of services provided to businesses. Division staff are providing more support to businesses across Workforce Recruitment Assistance, Training Services, and Accessing Untapped Labor Pools than in prior years.

Reported services to businesses have increased as indicated by the following year-over-year trends. Additionally, significant effort to improve the volume of actual services offered to business are realizing substantial gains.

Actual Services to Businesses PY 2018-current

- PY 2018 21.2% or 108 services
- PY 2019 18.7% or 154 services
- PY 2020 28.2% or 233 services
- PY 2021 \*38.5% or 542 services

\*(incomplete PY as of 5/31/2022, percentages listed are of total contacts to business)

Additionally, quality relationships with business and number of services provided to business customers are expected to continue to grow with the outlined goals related to quantity and quality of engagements with business in each Regional Business Engagement plan and through continued implementation of the Division's Business Engagement Strategic Plan.

IDVR is in the process of developing additional opportunities for our customers through our increased business engagement efforts. IDVR is working with Create Common Good to develop an agreement for a paid work-based learning experience to be available to IDVR customers year-round that would allow IDVR customers to gain valuable skills to then gain employment with local employers. Additionally, IDVR is in preliminary discussions with WinCo to develop a work-based learning experience for one of their warehouse positions that would allow individuals to gain work skills and be competitive applicants for their openings or in related positions with other local employers.

IDVR is currently evaluating the potential expansion of the Business Relations team to improve the quality of services provided to business, with expanded capacity to provide additional services. This evaluation is for the purpose of determining the capacity required to allow the Division to meet the vision of the program and to align with the goals under WIOA to increase employer services and partnership with WIOA partners at the local level to allow for increased and effective collaboration.

*2. Transition services, including pre-employment transition services, for students and youth with disabilities.*

The age requirement for a student with a disability who can receive Pre-ETS for Idaho Title IV WIOA programs is 14 years old to not older than 21 (up to the individual's 22nd birthday), effective this state plan.

IDVR works with employers to provide the five required Pre-Employment Transition Services and Transition services to both students and youth with disabilities in a competitive integrated setting. The Division provides a coordinated set of transition activities that are outcome oriented and promote movement from school to post-school activities, including postsecondary and vocational training, career exploration, in competitive integrated employment. Other transition services we provide include working with employers to provide job shadows, individual work-based learning experiences and when needed for IDVR youth customers, job-related services, job search and placement assistance, job retention, and follow-up and follow along services.

The Division provides transition services as "group services" or as "individualized services". Group transition services are provided to potentially eligible students; group transition services may also be provided to eligible students and youth with disabilities. Individualized transition services are provided to students through a pre-case or to youth who have been determined eligible and have an IPE.

Within the Regional Business Engagement plans the provision of business services includes identifying and working with businesses to promote and expand opportunities for students to gain work experiences prior to graduation from high school. IDVR has worked directly with employers to provide students with up to 150 hours of paid work-based learning experiences with employers in the community. To further build on this, IDVR is in the process of identifying a communication system to house general information on businesses that have identified as willing to partner to host students for these experiences to ensure ease of communication and understanding of business partners and what experiences that are able to offer students. Additionally, the Division is in the beginning stages of implementation within the internal Employer Information Pages, to house detailed information on employers that have expressed interest in hosting multiple students for work experiences, tours, job shadows, or informational interviews over time. This information is being compiled and housed in this destination to assure the information is accessible to all Division

staff that would benefit from access to this information on businesses willing to host students for these experiences.

The Business Spotlights that have been completed have also served as a platform for Division staff to connect and learn about opportunities for students and youth with the various businesses that have been highlighted in these sessions. Businesses have been able to communicate with Division staff their ability to support programs such as work experiences, and answer questions regarding their capabilities to support and host students during these sessions.

IDVR is in the process of developing a training video to assist IDVR staff with communicating effectively with businesses regarding these opportunities for students. This training video will give staff an example of how to approach businesses and communicate effectively regarding these work-based learning opportunities for students and youth.

IDVR has developed a survey for business partners and was provided to business partners that hosted students during the 2021 Summer Work Experience program across the state. Once feedback is gained, it will be utilized to make changes aligning with the needs of business to better provide this service to students while meeting the needs of businesses as the host site for the experiences.

#### *h. INTERAGENCY COOPERATION*

*Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:*

##### *1. The State Medicaid plan under title XIX of the Social Security Act;*

The Idaho Department of Health and Welfare (H&W) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid H&W operates the Idaho Home and Community Based Services project.

IDVR has collaboratively developed an agreement with H&W as it relates to Title XIX of the Social Security Act. This agreement was implemented July 1, 2020.

Collaboration with H&W has been significant in the area of supported employment. We have a process that easily and conveniently identifies what services customers are eligible for through approved Medicaid Waivers. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides IDVR with timely understanding of services that can assist an individual with the VR process, employment needs and a funding source if extended services are necessary to maintain employment. Additionally, IDVR has participated over the past 2 years with a Health and Welfare driven “Community Now” engagement with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. IDVR has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes. IDVR and H&W have also had trainings to support the VR staff on Medicaid services and benefits. This training assist IDVR VR staff to assist customers and families identify how those services can support success in an employment outcome.

The agreement outlines joint responsibilities, eligibility criteria, referrals, financial responsibilities, confidentiality provisions, and accountability and controls for IDH&W and IDVR.

*2. The State agency responsible for providing services for individuals with developmental disabilities; and*

IDVR has a solid working relationship with the Adult Developmental Disabilities Services (ADDS) program under the Department of H&W. There currently is no formal agreement. IDVR's collaboration with H&W has been significant in the area of supported employment. A significant portion of the SE population are individuals with developmental disabilities. IDVR and ADDS has a process that easily and conveniently identifies what services customers are eligible for through Medicaid Waiver. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides IDVR with timely understanding of services that can assist an individual with the VR process, employment needs, and a funding source if extended services are necessary to maintain employment. Additionally, IDVR has participated over the past two years with a Health and Welfare driven "Community Now" engagement with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. IDVR has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes. IDVR and H&W have also had trainings to educate VR staff on Medicaid services and benefits. This training allows IDVR staff to better assist customers and families to explain how those services can support success in an employment outcome.

*3. The State agency responsible for providing mental health services.*

The IDVR and Health and Welfare (H&W) Behavioral Health no longer have a formal agreement. Due to the States shift in the delivery of behavioral health services to a community model, IDVR is no longer has designated staff to work directly with H&W Behavioral Health. There is IDVR representation on the State Planning Council on Behavioral Health. The purpose of this Council is to "serve as an advocate for adults with serious mental issues, children with severe emotional disturbances, and others with mental health or substance use needs. Expand, improve, notify or transform Behavioral Health service delivery system for individuals with severe mental illness, serious emotional disturbance, and substance use disorders to ensure access to treatment, prevention, and rehabilitation services, including those services that go beyond the traditional behavioral health system. Advise the State Behavioral Health Authority on problems, policies and programs and provide guidance to the State Behavioral Authority in the development and implementation of the State Behavioral Health Systems Plan. Monitor, review, and evaluate the allocation and adequacy of behavioral health services throughout the state not less than once a year. Serve as a vehicle for intra- and inter-agency policy and program development. Present to the Governor and legislature by June 30 of each year a report on the Council's challenges and achievements and impact on the quality of life that Behavioral Health services had on Idaho citizens. The Council will incorporate recommendations for service system improvements submitted by the regional behavioral health boards." Regionally, the IDVR connects with Mental Health and Drug Courts where available. Referrals come to the IDVR regional and sub offices through community behavioral health organizations.



*i. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT*

*Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:*

*1. System on Personnel and Personnel Development*

*A. Qualified Personnel Needs*

*Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:*

- i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;*

**Table VR.1: Qualified Personnel**

<b>Job Title</b>	<b>Total Positions</b>	<b>Current Vacancies</b>	<b>Projected Vacancies Over the Next 5 years</b>
Qualified Rehabilitation Professionals Vocational Rehabilitation Counselors and Assistant Regional Managers	44	8	26
Vocational Rehabilitation Specialists	19	0	0
Vocational Rehabilitation Assistants	43	3	10
Field Management Staff	8	0	2
Human Resources	2	0	0
Fiscal	4	2	2
Staff Trainer	1	0	0
Planning and Evaluation	5	0	1
Transition Coordinator	1	0	0
Business Relations Manager	1	0	0
Administrative Assistants (Central Office Support)	2	0	1
Deputy Administrator	1	0	0
Administrator	1	0	0
Chief of Field Services	1	0	0
Business Operations Specialist	1	0	0
Community Rehabilitation Program Manager	1	0	0

**IDVR currently employs a total of 148 staff. The breakdown of personnel is listed above.**

Idaho's population by percent grow more than any other state between 2020 and 2021 at a rate of 2.9 percent which was 9<sup>th</sup> overall in numeric growth for all states, however the Division plans to continue operating under its current FTE allotment. The Governor is not currently supporting any increase of FTEs for non-K-20 educational programs.

The agency continues to operate under 148 FTEs but does reallocate FTE(s) to meet emerging needs where necessary. The following reallocation has occurred since the last iteration of the plan.

Current FTE allotment has been reorganized since the 2020 plan. FTE changes include:

- A Business Operations Specialist position was created to oversee contracts
- The Community Rehabilitation Program Manager position was created to help with the innovation and expansion activities and subsequent ongoing quality improvement of CRP services.
- The Business Relations Liaison position has been reclassified to a Business Relations Manager position as the scope of the position has increased.
- Three QRP FTE have been identified as Area Transition Counselors who serve the specific needs of coordinating and delivery of Pre-ETS across their local areas. These positions were necessitated by WIOA changes.

IDVR has had significant challenges recruiting and retaining qualified staff over the past several years and this has been even more evident over the past year. To increase IDVR's effectiveness in hiring and retaining qualified staff especially for the QRP positions the following strategies have been implemented or will be within the year:

- Flexibilities in work schedules
- Tuition and allowed work time for schooling requirements for staff working to achieve CSPD standard
- Paid Internship opportunities for students that meet CSPD Education credentials
- Collaborating with Division of Human Resources to demonstrate need for increased wages for State employees to be competitive
- Improved Job Announcements

Additionally, effective 11/29/21, IDVR implemented a two-pronged QRP Stabilization Program:

1. Retention bonuses for all staff in the titles of Regional Manager, Assistant Regional Manager, Sr. Vocational Rehabilitation Counselor and Vocational Counselor in exchange for a two-year service commitment dating from the payment date of the bonus (12/23/21), and

A three-tier sign-on/recruitment/retention program for new hires into the aforementioned titles, payable in the second paycheck after hire, after passing probation (1040 hours of service) in exchange for one-year service commitment, and upon completion of one year of employment (2080 hours of service) and satisfactory performance with a one-year service commitment from the final bonus payment date. At the present time, we are only recruiting for QRPs to fill counselor vacancies, regardless of whether the prior incumbent was a Vocational Rehabilitation Specialist (underfill for the VRC position).

*ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and*

The current vacancies broken down by personnel category can be found in Table VR.1: Qualified Personnel in the preceding section of this plan.

*iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.*

Projected vacancies by personnel category and the rationale informing these projections can be found in Table VR.1: Qualified Personnel and the subsequent narrative which is located in i.1.A.i. of this section.

### *B. Personnel Development*

*Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:*

*i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;*

The University of Idaho was the only institution of higher education in the State that offers a VR program in Idaho. However, in 2020 the University sunset this program.

Idaho State University was approved by the Idaho SBOE in November 2019 to begin a new Master of Counseling specialty program: Clinical Rehabilitation Counseling. This program began fall of 2020 and is offered in two Idaho locations (Meridian and Pocatello). The program has the ability serve 24 full-time students.

*ii. The number of students enrolled at each of those institutions, broken down by type of program; and*

Idaho State University was approved by the Idaho SBOE in November 2019 to begin a new Master of Counseling specialty program: Clinical Rehabilitation Counseling. This program began fall of 2020 and is offered in two Idaho locations (Meridian and Pocatello). The program has the ability serve 24 full-time students.

*iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.*

The Idaho State University Program has not yet graduated any students since starting the new program with their Fall 2020 cohort.

### *2. Plan for Recruitment, Preparation and Retention of Qualified Personnel*

*Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.*

IDVR will continue to recruit qualified staff from Rehabilitation Counselor Education programs. We maintain contact with Auburn University, Hofstra University, Montana State University, New Mexico Highlands University, Portland State University, San Diego State University, University of Arizona, University of Kentucky, University of North Texas, University of Northern Colorado, University of Texas Rio Grande Valley, University of Wisconsin - Stout, Utah State University, Virginia Commonwealth University, West Virginia University, and Western Washington University. Management staff also attends the Fall and Spring National Council on Rehabilitation Education (NCRE) conferences for recruitment (when feasible).

Additionally, IDVR supports paid and unpaid internships for master's level students in Rehabilitation or related fields. IDVR continues to face challenges in recruiting qualified applicants. The entry-level wage for a QRP is lower than comparable state and private positions. IDVR has increased wages for QRP's in Calendar Year 2021. IDVR has implemented a recruitment and retention bonus program to increase the potential for hiring QRP's as well as retain current QRP's. It is too soon to determine what impact, if any this program will have on QRP's for the agency.

IDVR conducts exit interviews with staff, when possible, to determine whether there are areas of concern affecting staff retention. The current trend suggests counselors are leaving VR for positions which do not require a master's degree and/or are paid more per hour. This trend has continued. Idaho has a very low unemployment rate and the wages have increased significantly in the private sector. As a State agency we are not as nimble in wage movement. For PY 2020 the turnover rate for the rehabilitation counselor position was 23 percent.

As of June 2022, it is less than six months since QRP retention bonus implementation. The Division believes that the strategy has had a preliminary positive impact on the retention of QRP as the Division has only experienced one QRP resignation since implementation of the retention strategy. Two QRP have been hired since implementation under the recruitment bonus strategy.

### *3. Personnel Standards*

*Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:*

*A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and*

The State of Idaho does not have a state licensure for rehabilitation counseling. IDVR's personnel standards satisfy Federal requirements as outlined in 34 CFR 361.18(c).

IDVR has established two QRP levels: Vocational Rehabilitation Counselor (VRC) and Vocational Rehabilitation Counselor Senior (VRC Senior). The standards that satisfy the Agency's Comprehensive System of Personnel Development (CSPD) policy for VRC positions are as follows:

1. A current Certified Rehabilitation Counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC). OR
2. Confirmed eligible (from CRCC) to take the exam to become a CRC. OR
3. Graduation from a program accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) with a master's degree in Rehabilitation Counseling. OR
4. A current Licensed Professional Counselor (LPC), Licensed Clinical Professional Counselor (LCPC) or Licensed Clinical Social Worker (LCSW) designation issued by the State of Idaho Bureau of Occupational Licensing (IBOL); Rules of the Idaho Licensing Board of Professional Counselors and Marriage and Family Therapists, IDAPA 24.15.01.

The standard for the VRC Senior position that satisfies the Agency's CSPD policy is a current Certified Rehabilitation Counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC). The LPC or LCPC designation does not meet the CSPD requirement for a VRC Senior.

Requirements to meet CSPD for staff hired at Vocational Rehabilitation Specialist (VRS) level and maintain employment eligibility include the following:

The VRS will be required to meet IDVR's CSPD standard within five years of the staff member's hire date.

1. The VRS, with assistance from Regional Manager (RM), will develop a CSPD Plan within six-months of hire date to be reviewed for approval by Human Resources. Each CSPD plan will require the following elements:
  - a. Educational requirements necessary to complete CSPD (if applicable). Number of courses required and an outline of anticipated timeframe for completion of each course.
  - b. As the coursework is completed grades must be submitted to the Regional Manager and Human Resources within one month upon completion of term.
  - c. Employment internship or work experience requirement necessary to complete CSPD (if applicable).
  - d. Official acceptance documentation should be submitted to Regional Manager and Human Resources.
  - e. Acceptance of RSA scholarship (if applicable).
  - f. Estimated cost of tuition and books.
  - g. Outline of timeline for completion from the university.
2. CSPD will be evaluated for progress as part of the VRS overall performance requirements as outlined in the VRS job description each year.
3. The VRS is expected to meet periodically with their manager until the CSPD plan is implemented. The manager will submit a monthly report to HR, which will provide a summary of progress.
4. Staff members at VRS level will be required to produce adequate semester progress to Human Resources for their personnel file.

When IDVR experiences a limited number of recruits for a QRP positions the agency will consider hiring individuals into the VRS classification.

IDVR requires a CRC for all Regional Manager or Assistant Region Manager positions.

IDVR will reimburse the cost of the CRCC application and testing fee upon verification of achievement of CRC certification, when funds are available.

IDVR will recognize current standards as outlined in the CRC Certification Guide when determining qualifying degrees, programs, coursework and acceptable employment experience. <http://www.crccertification.com/>.

The agency will annually review and evaluate if financial assistance can be provided to support VR Specialists (VRS) that are working towards meeting CSPD. HR will notify all VRSs at the time IDVR

determines that financial assistance is available. The notification will specify the time frame and process on how to obtain the financial assistance offered.

*B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.*

IDVR is committed to providing all employees with professional development opportunities which will enhance employee job performance; support the Agency's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities.

IDVR has established education and experience requirements for each position in the Agency with a focus on alignment of requirements contained in section 101(a)(7)(B)(ii) which meet or exceed the standards required in 101(a)(7)(B)(ii)(I)-(II) including a requirement for a master's or doctoral degree in vocational rehabilitation or a related field to be recognized as a qualified rehabilitation professional at IDVR. When unable to hire VRCs, the Division supports a Vocational Rehabilitation Specialist position with fewer requirements (explained under 3(a) in the preceding section, but requirements which are specifically outlined to meet the conditions of the 21<sup>st</sup> century workforce understanding.

IDVR hires with a preference for people who have experience working with people with disabilities, particularly around advocacy and providing direct support.

With the increased WIOA emphasis on workforce development the Division will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs. IDVR will establish ongoing requirements to participate in continuing education around a 21<sup>st</sup> century understanding of the workforce including periodic updates on LMI and career pathways and evolving regional labor trends and expectations.

Through an increased emphasis on data-driven decisions, IDVR will increase utilization of the most recently available labor market information to best inform customer vocational decisions.

#### *4. Staff Development*

*Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:*

*A. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and*

IDVR tracks and monitors each employee's individual training and development. Special emphasis is placed on training in those areas of need as indicated by the case file review and emerging field needs and as prioritized by the executive leadership team and the SRC. Additional priorities include training required to maintain CRC and/or LPC certification. Training for staff also includes the following topics: ethics, disability related topics, vocational counseling, assessment, job placement strategies, and assistive technology.

*B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.*

An annual training needs assessment is conducted to determine personnel training needs. Individual employee skill sets, position descriptions, and position duties are also assessed to identify areas that require further development. In addition, organizational needs are analyzed to identify areas in need of succession planning, to expand those employee skills essential to provide effective services to special populations, and to meet job demands. Information gathered from employee performance evaluations; supervisory feedback, employee exit interviews, and internal monitoring results also assist the Division with identifying areas of need.

In 2020, IDVR revised its policies and procedures that impact service provision to IDVR customers. All field staff received eight hours of training on the updated Field Services Manual in January 2021 prior to statewide implementation in February 2021. In addition, all Counselors received four hours of training specific to federal eligibility and comprehensive assessment requirements in March 2021. Staff continue to receive Field Services Manual updates state-wide on a periodic basis, however the frequency and intensity of updates is expected to lessen following a major overhaul of the FSM structure and presentation.

IDVR held new field staff Motivational Interviewing (MI) training in 2021. Two separate four-day sessions were held with Session 1 occurring June 1-2 and repeating June 29-30. Session 2 for new employees was held on August 6-7 and again on September 4-5. Providing Motivational Interviewing training for staff continues to be an evidence-based agency strategy.

In September 2021 IDVR held its annual statewide in-service. Topics for our general session included an overview of WIOA's Other Measures That Matter and review of IDVR and national state-federal VR performance indicators. Breakout session topics included Informed Choice Counseling, Case File Documentations, Behavioral Ethics, Trauma-Informed Communication, and an ADA Overview.

Throughout the year, training requests are approved for individual and group training in areas of interest or need. A variety of platforms are utilized for dissemination. In 2021, most Division group trainings were held virtually, as are most external training opportunities. The Division continues to provide individualized training in-person whenever feasible. Topics/conferences included but were not limited to: Ethics, the Idaho Conference on Alcohol and Drug Dependency, Tools for Life, counseling theories and techniques, assistive technology, Programmatic and Physical Accessibility, disability-specific trainings, and various annual conferences for rehabilitation professionals (e.g., NRA, NCRE, CSAVR, or the Summit Group). The Division continues to be a strong advocate for continuing education participation when relevant training is identified, particularly where training can impact the service delivery of public vocational rehabilitation services.

Through an RSA grant administered by The Center for Innovative Training (CIT-VR) at The George Washington University, the Division continues to require all field staff to complete the VR 101 course. This 15-hour course provides an overview of state-federal VR programs to help staff understand the history, scope, and purpose of the state-federal vocational rehabilitation program. This training is available until Spring 2022. The Division continues to work with CIT-VR to develop and disseminate timely and appropriate trainings relevant to public vocational rehabilitation counseling.

Internally, optional trainings are provided once a month on current procedures and processes. Common topics include but are not limited to fiscal issues, instruction on Pre-ETS, and the navigation and functions of the AWARE case management system.

Succession planning and leadership development continue to be a focus for the Division. All Central Office and Field Services Managers complete a Supervisory Academy offered by the Idaho Division of Human Resources. The academy includes 10 modules on Performance Management: Development, Coaching and Feedback, Expectations, Motivation, Documentation, Calibrating Ratings, Evaluation, I-Perform (performance evaluation software program), and Progressive Discipline. When financially able the Division supports staff in the Emerging Leaders series. The Division utilizes permanent Assistant Regional Manager positions throughout the state to support succession planning and leadership development.

New VR staff participate in a new employee orientation which is provided online, by Central Office staff, the immediate supervisor, and other designated employees. New VRAs also participate in an online series designed for paraprofessional staff. The course covers the History of VR, Basic Ethical Considerations, Navigating Sticky Situations, Developing Collaborative Relationships, and Cultural Diversity.

#### *5. Personnel to Address Individual Communication Needs*

*Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.*

*Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.*

IDVR provides or purchases interpreter or language services required to access the program.

The Agency is currently working with the Division of Human Resources to determine a process and standards to assess staff competency in Spanish or other foreign languages. If staff meet competency standards, they may work with and interpret for customers who's primarily language is other than English.

IDVR has created a statewide counselor position for the deaf. This position will better serve individuals who are deaf and increase the overall effectiveness of our service delivery for this underserved population. The position filled last fall and has passed certification and is now receiving referrals as of January 2022.

Since Idaho has a separate entity that addresses issues related to low vision and blindness, IDVR does not provide specific training to its staff in braille, but instead refers customers who require braille to the Idaho Commission for the Blind and Visually Impaired.

#### *6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act*

*As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.*



The Transition Coordinator will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

The Transition Coordinator has extensive knowledge of IDEA personnel qualifications, under 34 CFR 300.156. Training and education will be identified for staff regarding service provision, coordination, and best practices in serving students with disabilities. The Transition Coordinator is assigned as an active member of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Training opportunities offered by IDVR which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, in the fall of 2021, IDVR brought together public educators and VR Transition staff at the Transition Institute. The Transition Coordinator facilitates monthly Transition Leadership team meetings where changes are shared with the Leadership Team. The Team takes the information from the meeting and shares it with their regions. The Transition Coordinator also provided In-Service breakout session on Pre-ETS available to all staff. Finally, the Transition Coordinator participates in Special Education Advisory Panel for the State Department of Education.

#### *j. STATEWIDE ASSESSMENT*

*1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:*

*A. With the most significant disabilities, including their need for supported employment services;*

The number of people with disabilities in Idaho is growing. The American Community Survey (ACS) one-year estimates of individuals with disabilities in Idaho increased from 204,780 in 2014 to 241,391 in 2019 representing an increase of 3.38 percent year over year, and 17.9 percent over the past five years (ACS Disability Characteristics, 2014, 2019 1-Year Estimates).

According to data from the American Community Survey (2019), 13.7 percent of Idaho civilians living in the community report having a disability (one percent higher than the national average), including 8.9 percent of Idahoans age 18-34, and 13.6 percent of Idahoans age 35-64. A more extensive profile of Idahoans with Disabilities is contained in section II(a)(1)(B) Workforce Analysis portion of the combined section of this plan.

The Division has hired a CRP manager who will have a full commitment to the position following the transfer of his former program to the Idaho Department of Health and Welfare on July 1, 2022. To date the CRP manager has engaged with VRTAC-QE and is currently creating a project management plan to formalize activities and timelines for the CRP innovation project.

Since the Division concluded our initial CE Pilot, IDVR has continued to participate in the Supported Employment and Customized Employment Communities of Practice hosted through Cornell and the George Washington University/Vocational Rehabilitation Technical Assistance Center for Quality Employment (VRTAC-QE). Additionally, the Division participates in Region X (Former RSA Region X) Community Rehabilitation Program groups with other CRP program staff in Alaska, Idaho, Oregon, and Washington.

The Division will continue I&E planning activities into PY22 but anticipates initial engagement with CRPs to collect comment and suggestion on I&E prior to formalizing a plan of action for these activities. The Division is also focused on the expansion of rural service delivery options for customers and expanding existing service delivery in urban areas where lacking. IDVR has proposed a modification of qualifications for potential CRPs including a new option where smaller operations can more easily qualify as an IDVR provider through completion of the 40-hour ACRE training. The Division is anticipating the rule change to be approved but must engage in Idaho's negotiated rulemaking process prior to finalizing rule and initiating the change. This strategy should help improve provider coverage across the state and lessen time to service for customers in areas lacking sufficient current coverage.

As a result of CE pilot difficulties, the Division plans on a more granular implementation of CE concepts and principles to further CE efforts in a meaningful and achievable strategic approach. IDVR will focus first on efforts to reinforce and improve core CRP services with innovation and expansion activities (to include job skills, training, job coaching and soft skills). As the Division reimagines our guidance on assessment services, CBWE and trial work, IDVR will infuse aspects of discovery to better condition service providers for more advanced CE concepts. Once the Division is satisfied with the quality of service in the initial phase, we will engage in continuous quality improvement and adaptation until the service reaches fidelity to articulated standards. IDVR will then move to reinforce other aspects central to Customized Employment following stage 1 mastery.

IDVR has a member on the Idaho Behavioral Health Planning Council (IBHPC). The IBHPC mission is to "promote advocacy, collaboration, education, and policy development to create a seamless behavioral health delivery system."

The current IBHPC strategic direction includes:

1. Provide oversight and coordination of regional behavioral health boards.
2. Fulfill reporting requirements.
3. Support the development of community crisis centers in each region.
4. Conduct a statewide assessment of prevention programs.
5. Assist regions in setting up children's subcommittees.
6. Educating legislators.
7. Conducting an environmental scan of the readiness and capacity of the system to ultimately generate strategies to improve continuity of care.

<https://healthandwelfare.idaho.gov/about-dhw/boards-councils-committees/idaho-behavioral-health-planning-council-bhpc>

Additionally, IDVR's Administrator has tasked all Regional Managers to develop a regional specific outreach plans including this population. The draft regional outreach plans have been submitted, and since mental health services vary substantially across regions, these plans are tailored to services available in the community. For example, not all regions have a homeless shelter. The Division anticipates a revision and incorporation of best practices across regional plans to further strengthen this strategy.

100 percent of Idaho is designated as a Health Professional Shortage Area (HPSA), specifically for Mental Health services (Idaho Behavioral Health Council, 2021). Idaho Behavioral Health

Workforce Plan 2021 is Governor Little's initiative to increase providers of behavioral health services in the state of Idaho. The initiative has engaged VR to help train IDVR customers to be peer support specialists to help fill this gap in service provision.

The Division maintains involvement in mental health courts and drug courts with the frequency of engagement varying across regions (weekly, monthly, quarterly, bi-annually). While mental health outreach remains difficult, the Division has developed rapport with community-based workers to help promote these referrals. Efforts to connect with community based mental health providers continue, and the Division works to offer training on VR services to these vendors.

Additionally, IDVR has engaged with the Idaho Anti-Trafficking Coalition. The Coalition reached out to the Division after analysis showed 83 of 242 individuals, they served in 2021 self-identified as having a disability of some kind. Cognitive, physical or mental disabilities were eventually identified in over 75 percent of victims served. A training was provided to all field staff regarding services and support, and the Division helped clarify what services and opportunities were available at IDVR to promote appropriate referral. IDVR maintains a similar relationship with the Idaho Coalition Against Sexual & Domestic Violence.

IDVR commissioned a Comprehensive Statewide Needs Assessment (CSNA) beginning late summer of 2019, including an assessment of the rehabilitation needs of youth with disabilities in transition and student need for Pre-Employment Transition Services. The CSNA was finalized in early 2020 and was retained to inform this two-year update.

The independent CSNA identified the following themes in the area of needs of individuals with the significant disabilities including their need for supported employment:

- Supported Employment is a necessary service for people with the most significant disabilities and needs, which IDVR has been successfully providing for many years. Changes due to WIOA has created some challenges in implementing new practices, but overall IDVR excels in this area.
- Participants expressed that there is a need to improve the quality of employment outcomes for individuals with the most significant disabilities.
- Customized Employment is seen as an important employment strategy for individuals with the most significant disabilities. Training in CE has been completed in partnership with the WINTAC, but it has not been sustainable to date. Many participants indicated that they are looking forward to the implementation of CE 2.0 after IDVR revamps the training, expectations and fee structure.
- The rehabilitation needs of individuals with the most significant disabilities that were cited the most frequently (beyond SE and CE) include transportation, job skills, training, job coaching and soft skills.

### **Individual Survey: Barriers to Obtaining or Keeping a Job**

Respondents were presented with a list of 16 barriers to obtaining employment and asked to indicate whether the item had been a barrier that impacted their ability to obtain or keep a job. The table below summarizes the most frequently stated barriers and the impact on obtaining or keeping employment.

Barriers to Obtaining or Keeping Job	Percent Reporting Barrier
Employer concerns about my ability to do the job due to my disability	55.3%
Lack of education or training	53.6%
Mental health concerns	46.3%
Lack of job skills	44.8%
Lack of job search skills	32.3%
Lack of reasonable accommodations at work	29.9%
Lack of assistive technology	24.2%
Concern over loss of Social Security benefits due to working	22.1%
Substance abuse	12.2%

Respondents were presented with a list of barriers and asked to identify the three most significant barriers that they have faced specifically toward getting a job. Table VR.3 contains a summary of the top-three ranked barriers identified by participants and the frequency of identification.

<b>Significant Barriers to Getting a Job</b>	<b>Times identified as a "top-three" barrier</b>	<b>Percent of Total Number of Respondents Selecting Barrier</b>
Lack of education or training	488	43.7%
Employer concerns about my ability to do the job due to my disability	437	39.2%
Lack of job skills	358	32.1%
Mental Health concerns	319	28.6%
Lack of available jobs	286	25.6%
Criminal record	203	18.2%
Lack of job search skills	163	14.6%
Lack of reasonable accommodations at work	145	13.0%
Concern over loss of Social Security benefits due to working	137	12.3%

A total of 1,116 respondents answered the question. Lack of education or training, employer concerns about my ability to do the job, and lack of job skills were the three top items selected by respondents, matching two of the top three responses in the previous Table X. The last 5 items on this list also resemble the last five items on the list in Table X.

Individual survey respondents were asked a yes-no question asking whether they had suggestions to improve IDVR to help people with disabilities to get a job or move to a better job. There were 285 “yes” responses (23.6%) from the 1,206 respondents.

Respondents were asked a subsequent open-ended question and given the opportunity to provide suggestions on how IDVR can improve in assisting people with disabilities to get a job or move to a better job. Responses to this question that were grouped into the following themes:

1. Provide services in a timely manner
2. Improve VR counselors’ communication and customer service
3. Increase medical aspects of disability training to understand a wide variety of disabilities
4. Increase awareness of IDVR and services for customers and employers

Individual survey respondents were asked an open-ended question to provide any additional comments that they would like to share regarding IDVR services. There were 393 narrative responses. Two-hundred two comments were appreciative and positive toward IDVR services and counselors. Themes within the remaining narrative responses noted delays in communication, counselor attitudes, wait times for services, and clarification of services available.

There is a strong correlation between those individuals requiring supported employment (SE) services and presumptively eligible participants in the VR program. To approximate the potential need for SE services, the Division will utilize counts of Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) beneficiaries.

Individuals who qualify for SSI/SSDI are by law presumptively eligible for Vocational Rehabilitation services. The United States Social Security Administration (SSA) estimates that as of December 2020 21,177 Idahoans in the 18-64 age category are receiving SSI.

State or area	Total	Aged	Blind and disabled	Under 18	18-64	65 or older
US	7,959,766	1,136,162	6,823,604	1,108,612	4,556,131	2,295,023
Idaho	30,780	1,689	29,091	4,793	21,177	4,810

Furthermore, Table 8 in the Annual Statistical Report on the Social Security Disability Insurance Program (2020) lists 46,724 Idahoans age 18-64 as SSDI beneficiaries.

According to internal data, IDVR took applications on 2524 cases in PY 2020 including 867 cases where SSI and/or SSDI benefits were verified. This represents a presumptive eligibility rate of 34.35 percent at application, an increase of 2.6 percent over PY 2019.

#### *B. Who are minorities;*

The identification and service estimates for minority populations in Idaho are derived from population estimates and internal agency data on customers.

The Hispanic population is Idaho's largest minority group at 12.8 percent, 11 percent of all Idahoans reported Mexican origin with 1.8 percent for all remaining Hispanic origin subcategories. (2019 ACS Demographic and Housing 1-Year Estimate). Internal agency data suggests this population remains underserved representing 8.41 percent of total applications in PY 2019 and 8.76 percent in PY 2020. While the Division is aware of the sustained gap in both applications and plans for this population., it is worth noting that the age distribution for this population skews substantially younger (40 percent of Idaho Hispanics were under age 20, compared to 26 percent of non-Hispanics as of 2019) which may explain some of the discrepancy in applications counts: "As in the United States as a whole, a relatively large share of the Hispanic population in Idaho is made up of children and young adults, with few older individuals. This is in contrast to the non-Hispanic population, which is more evenly distributed across age groups" (Hispanic Profile Data Book for Idaho – 5<sup>th</sup> Edition, 2021). This lower average age may also explain why Idaho's rate of disability for Hispanics at 10.3 percent is significantly lower than the statewide average of 13.7 percent. The population pyramid in Idaho's Hispanic Profile Data Book 5<sup>th</sup> edition

(2021) illustrates the extreme skew toward youth in this population. Consequently, IDVR should expect an increasing proportion of Hispanic youth, students and customers as these cohorts age.

Further analysis of outreach and service delivery by race is problematic due to low population percentages in remaining categories, however the following table presets data for Race alone or in combination with one or more other races from latest available ACS Demographic and Housing Estimates (DP05) which best aligns with IDVRs internally available data:

#### **IDVR Service Delivery Rate by Race**

	ACS 2019 1-Year	PY 2019	PY 2020
White	92.5%	95.46%	95.50%
Black or African American	1.2%	2.23%	2.41%
American Indian and Alaska Native	2.4%	3.95%	3.30%
Asian	2.5%	1.08%	1.33%
Native Hawaiian and Other Pacific Islander	0.4%	0.56%	0.68%
Some other race	4.5%	--	--

Idaho's demographics are changing, and Idaho was the second fastest growing state relative to population in the past 10 years, with the population growing over 17 percent in the decade (US Census Bureau, 2020). Idaho was the fastest growing state by percentage in the last year, growing 2.9 percent and was ninth in total numeric growth at 53,151 (US Census Bureau, 2021).

While Idaho is traditionally a major state for resettlement in Regions 3, 4, 7 and 8, net international migration has slowed significantly under the COVID-19 pandemic (with the primary driver of Idaho's recent population increase coming from net domestic migration).

In addition to demographic information and internal case management data, IDVR remains informed on the needs of specific minority populations through efforts which are further elaborated on in section 'o', the program specific strategy section of this plan for the Division.

#### *C. Who have been unserved or underserved by the VR program;*

According to the latest Comprehensive Statewide Needs Assessment, the most common themes that emerged in this area based on the perceptions of respondents were:

- In general, a case can be made that individuals living in rural areas, with less access to services, support, training and education are underserved.
- Language and culture are barriers to certain populations accessing services or seeking employment, including a growing refugee population in parts of Idaho. Translation services are not readily available.
- Native American tribes live in isolated locales in Idaho with limited employment options.
- IDVR has increased outreach efforts and coordination with partner agencies; however, there is a continued need for outreach to potentially unserved populations.

- Ex-offenders with a high rate of substance abuse issues require services from multiple agencies and face resistance from the employment community.

The WIOA Advisory Group has specifically identified rural service provision a traditionally underserved area to address in II.c.1 of this plan.

The Division utilizes telephone-based translation services when necessary to bridge language barriers presented by Idaho's growing refugee population.

The outreach activities targeted toward Idaho's refugee and minority populations are detailed in section o of the program specific section of this plan for the Division.

The Division notes that the intersection of rural service provision and tribal affiliation can present substantial barriers to obtaining employment in these rural communities and will continue to view this population as underserved. IDVR will continue outreach efforts accordingly for this population.

The Division will continue to strengthen partnerships with entities in the workforce development system to reach populations of interest such as youth.

The Division co-locates with the Idaho Department of Correction. IDVR maintains relationships with IDOC and IDJC and will continue to engage with these entities to further efforts to reach youth and adults in the corrections system across Idaho.

IDVR is a current sub-awardee of the 5-year State Apprenticeship Expansion Equity and Inclusion (SAEEI) Grant that was awarded to IDOL. IDVR's Business Relations Manager is an active member of the Apprenticeship Idaho Coalition and the Diversity, Equity, Inclusion, and Accessibility (DEIA) team under the SAEEI grant. The agency also created an Apprenticeship Counselor/Coordinator position to work on the DEIA team under this grant to support work to reach the grant deliverables around increasing Diversity, Equity, Inclusion, and Accessibility for Registered Apprenticeship Programs in Idaho. In addition to IDVR's members of the DEIA team, the team also includes two members of the greater IDOL Apprenticeship Team, and two positions from Idaho Department of Corrections. The DEIA team is currently evaluating grant deliverables and prioritizing the development of marketing and educational materials for employers and sponsors that discuss the importance and value of diversifying their talent pipelines and workforce. The partnership between DEIA team members will foster positive relationships that will assist both individuals with disabilities and individuals with IDOC involvement to be informed about Registered Apprenticeship opportunities and to be successful in Registered Apprenticeship programs that they enter. However, though those areas are targets of the DEIA team there is an overarching goal of increasing diversity more broadly to include areas of apprentices completing Registered Apprenticeships throughout the state of Idaho.

IDVR has also established a positive working relationship with Idaho Business for Education the sub-awardee of the Idaho Workforce Development Council's Youth Apprenticeship Readiness Grant (YARG) for supporting students and youth in Idaho to have increased knowledge of and access to Registered Apprenticeships across the state. This partnership is working towards the goal of increasing the amount of students and youth who have awareness of and enter into Registered Apprenticeship Programs. Partnership processes have been developed to include monthly meetings, a detailed referral system, an increase in resource sharing, and joint presentations and presence at high schools.

The Division will be sending expert WIOA representation to the annual Idaho Department of Juvenile Correction conference for a panel presentation on core WIOA partners and services available across Idaho's Workforce Development System.

*D. Who have been served through other components of the statewide workforce development system; and*

According to the latest Comprehensive Statewide Needs Assessment, the most common themes that emerged in this area based on the perceptions of respondents were:

- Overall, partnerships within the Idaho Workforce Development System are regarded as positive and helpful, especially at the administrative level.
- Positive collaboration and partnership aspects include:
  - IDVR inclusion in statewide workforce development listening sessions;
  - Collaborative work on the combined state plan;
  - IDVR administrator is member of the workforce development council and chairs the one-stop committee;
  - IDVR provides consultation (e.g., physical and programmatic accessibility) with the American Job Centers.
- The level of local partnership between IDVR and the American Job Centers was described as varying across the State at the local level. Some felt that co-enrollment was of no concern as it is a common occurrence in small communities, while others felt as though there was no active level of co-enrollment where participants would be served by multiple agencies through strategic partnerships.
- IDVR could improve its collaboration with the Workforce Development System through sharing data, increased cross-referral, leveraging resources, sharing participants, and developing youth program partnerships

The themes described above are informed by VR staff and other partner respondents.

Conversely, the following themes are expressed by individuals with disabilities. The CSNA asked individuals with disabilities several questions regarding the American Job Centers, including accessibility, access to training and employment, the value of and the effectiveness of the services available through the AJC. The table below details results from individuals with disabilities using the Job Center for seeking training and employment.

	Yes	No	Total Number of Responses
Did you go to the Center to find a job?	68.2%	31.9%	314
Did they help you find employment?	39.4%	60.6%	203

Two-hundred fourteen (68.2%) out of 314 individuals went to the Center with the purpose of seeking assistance to find a job. Two-hundred and three respondents answered the question regarding receiving help that resulted in employment with 60.6% indicating that they did not receive assistance in finding a job.



The majority of the individuals seeking assistance at the AJC were seeking employment (68.2%). Of the 203 respondents, 123 (60.6%) did not find employment with AJC assistance.

Table VR.5 identifies the ratings for the helpfulness and the value of the American Job Centers by individuals with disabilities that responded to the survey.

<b>Value of Services Rating</b>	<b>Count</b>	<b>Percent of Total</b>
Yes, the services were very valuable	105	34.1%
The services were somewhat valuable	122	39.6%
No, the services were not valuable	81	26.3%
<b>Total</b>	308	

Almost 74% of respondents found the services available at the American Job Centers to be either somewhat or very valuable. Just over one-fourth of the respondents indicated the services were not valuable.

Table VR.6 breaks down the reported effectiveness of the American Job Center by individuals that responded to the survey.

<b>Effectiveness Rating</b>	<b>Count</b>	<b>Percent of Total</b>
Very effective	65	20.7%
Somewhat effective	81	25.8%
Somewhat ineffective	40	12.7%
Very ineffective	37	11.8%
No opinion	91	29.0%
<b>Total</b>	314	100%

Only 46.5% of the 314 respondents that answered the question indicated that the American Job Center was effective, while roughly 25% of the respondents indicated that the Centers were not effective in serving people with disabilities and 29% did not have an opinion.

The CSNA provided IDVR several recommendations based on the results of the Needs of Individuals with Disabilities served through other Components of the Statewide Workforce Development System including:

1. IDVR should develop regular opportunities for cross-training among local level WIOA core partner staff to learn about available services and increase the level of co-enrollment across workforce programs to leverage resources and better serve Idahoans with disabilities.
2. IDVR is encouraged to identify effective ways to share client data and develop joint opportunities to increase the level of partnership at the local level.
3. IDVR should continue efforts to improve services for people with disabilities in the larger Idaho workforce system by maintaining partnerships and the level of engagement of IDVR within the WIOA core programs. For example, IDVR can provide ADA training, disability awareness and etiquette training, community accessibility, etc. to workforce agencies as well as community partners.
4. IDVR is encouraged to develop more formal partnerships with the Title I youth program to increase the array of services available to youth in Idaho.

The WIOA Advisory Group, in collaboration with the Workforce Development Council's One-stop Committee will continue to engage in a series of ongoing meetings to identify common and unique strategies which are in need of improvement on a statewide level. The Division engaged in the second strategic planning meeting with all WIOA Advisory Group and the One-Stop Subcommittee members. The purpose of the meeting was to identify the shared goals, priorities, and strategies for this Combined State Plan. While collaborative work in this area has begun, more work in this area is still needed.

Meetings at the local-area level are ongoing which include all core partner agencies and numerous One-Stop partners to determine and advance strategies for common referral and orientation, reducing duplication of effort and potential increased levels of co-enrollment. These meetings will help inform a better understanding of the needs of individuals with disabilities served by agencies external to VR in the One-Stop system.

The Administrator of IDVR currently chairs the WDC's One-Stop Subcommittee.

*E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.*

The percentage of Idahoans who experience disability varies significantly by age. While this variance can be attributed to several factors, in general this rate increases over time with substantial increases both early in life as congenital disabilities are initially identified, and later in life as disabilities are acquired through events or emerge due to the natural aging process. While 8.9 percent of Idahoans age 18-34 disability compared to 13.6 percent for those age 35-64, and 24.6 percent of those age 65-74.

Idaho has a higher percentage of workers age 24 and younger than the nation as a whole, this is historically reflected in the percentage of transition age youth served by IDVR. Students and youth under 25 represented 41.44 percent of IDVR cases in PY 2020.

IDVR's 2019/2020 CSNA noted several major recurring themes relating to Pre-ETS and Youth needs:

- Overall, IDVR has successfully implemented pre-employment transition services and has increased opportunities for youth with disabilities to prepare for meaningful employment. Work-based learning experiences have been a particular strength of pre-employment transition services developed through contracts across the state.
- Although the implementation of pre-employment transition services has been successful, IDVR will need to monitor the increasing demands of students, educators and families across the State to ensure that there are adequate resources available to meet the demand.
- IDVR has implemented services to meet the needs of students with the most significant disabilities. Youth with less significant disabilities (e.g., specific learning disabilities) need to have access to IDVR services, with varying levels of support to meet their specific needs. These include disability related services, training and educational opportunities and support, work readiness and job exploration skills.
- A growing number of relationships with educators have been established resulting in increased access to IDVR and other workforce system partners for students and youth.

However, a continued lack of understanding and support by parents persists, indicating a need for IDVR to increase direct communication with parents and families of students and youth with disabilities.

One of Idaho's priorities is to collaborate across agencies to increase student participation in services and education that prepare them to participate in their career pathway. To address this priority IDVR understands the importance of increasing the communication with parents and families to understand youth and students with disabilities and their need for pre-employment transition services and other transition services. The Division is addressing these needs through multiple avenues:

First, IDVR worked with Idaho Parent Unlimited (IPUL), our parent center, to develop a student/family survey to determine the needs of students and youth. This survey is currently being disseminated by the Idaho State Department of Education, IPUL, and IDVR. The survey results will provide both information on the direction of services as well as a collection point for contact information of families of students and youth with disabilities for outreach purposes.

IDVR has also addressed the need to increase communication by including parents and families in Idaho's multi-agency statewide Transition Institute. Having parents and/or family members in LEA transition planning will allow parents greater input into the transition planning process. It will also provide information to families on the unique services available to both students and youth.

Lastly, is the Division's focus to dedicated transition staff via the new ATC and Pre-ETS Counselor positions. The number one priority for Area Transition Counselors and Pre-ETS-Counselors is to provide more outreach to LEAs, higher education, and other youth services. This outreach has led to LEAs having a better understanding of Pre-ETS and vocational rehabilitation. The LEAs have used their increased knowledge to better educate families which impacts participation rates in services. We have already seen that these outreach efforts have led to a significant increase in the number of programs that are available to students, and most importantly in rural communities that have been more difficult to serve. Due to the confidentiality requirements of IDEA, the Division's best approach to connect with students and youth is through the LEAs who are aware of service needs and are best suited to provide appropriate referral. The Division has worked to increase our presence through these positions focused solely on Pre-ETS and similar services to youth.

### **Transition-age Youth Survey: Three Most Important Services for Obtaining and Keeping Desired Job**

Respondents were provided a list of IDVR services and asked to identify the three most important services they needed to help obtain and keep the job they desired. There was no limit to the number of services respondents could choose. Table VR.7 summarizes the results.

	<b>Number</b>	<b>Percent of Total</b>
Help finding a job	156	50.6%
College education	116	37.7%
Transportation	110	35.7%
Help with employment preparation activities e.g. resume, application	103	33.4%
Support on the job like a job coach	102	33.1%
Vocational training	86	27.9%
Affordable housing	53	17.2%
Mental health counseling	35	11.4%

	Number	Percent of Total
Assistive technology	19	6.2%

Help finding a job, college education, and transportation were the most frequently selected items in response to the question regarding the three most important services needed to obtain and keep a desired job by transition-age survey respondents. When compared to the previous question, note that results are different college education is the top item, help finding a job ranked fourth, and transportation is in the sixth position in the table above.

Transition-age survey respondents were asked an open-ended question regarding any other comments about the services that would help to prepare for, obtain and retain employment. Seventy-nine narrative responses were received. Three comments were positive in regard to IDVR transition services and seventeen were critical of services.

The following recommendations from IDVR's 2019/2020 CSNA related to the needs of youth with disabilities in transition:

1. IDVR is encouraged to continue efforts to identify needs and programs for implementing pre-employment transition services. The agency should consider adding some tiered approaches that will enhance the delivery of pre-employment transition services to students with disabilities that have differing functional capacities. In addition, IDVR is encouraged to develop strategies, either through direct or contracted services, to increase the delivery of pre-employment transition services to all areas of the State.
2. IDVR is encouraged to focus outreach efforts to students and youth with disabilities that are not traditionally known to IDVR through collaboration with special education services. The agency should consider increasing marketing and outreach to mainstream educators, 504 coordinators, school counselors, school nurses, and pediatric medical providers in the community. As outreach results in increased referrals and applications by these populations, IDVR is encouraged to tailor services to meet the diverse needs of these individuals.
3. IDVR is encouraged to increase marketing, communication and expectations directed toward parents and families of youth with disabilities.
4. IDVR should consider assessing the availability of IDVR services and making them more accessible across the state, particularly in the remote areas of high concern for youth.

The Division will continue to increase our efforts to deliver services to students with disabilities in response to WIOA mandates. The Division's proposed activities to address Pre-ETS and youth is detailed in section 'o' of this plan.

*2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and*

The 2019/2020 CSNA summarizes results in section 6 of the document "Need to Establish, Develop or Improve Community Rehabilitation Programs in Idaho", the most common themes that emerged in this area were:

The following themes were recurring from the individuals interviewed for this assessment around the need to establish, develop or improve community rehabilitation programs serving individuals with disabilities in Idaho:

1. Overall, IDVR has strong partnerships and access to CRPs in the more populous areas of the state, however provider coverage and range of available services becomes more irregular in the rural and remote areas of Idaho.
2. There were concerns about the quality and quantity of employment outcomes for IDVR consumers that receive CRP services.
3. CRP employment services were generally described as in need of improvement. There are varying perspectives on why employment services provided by CRPs are not as successful as they can be.
4. Pre-employment transition services have created additional opportunities for CRPs. This is seen as a great opportunity for all involved, but the level of quality varies. Some view contracted services versus fee for service as a practice which promotes differing outcomes.
5. Depending on the lens of those interviewed, there are a variety of CRP services needing attention or improvement. These include, but are not limited to:
  - a. Improvement in CRP evaluations to include a wider variety of community-based evaluation sites.
  - b. Concerns of conflict of interest when CRPs are recommending continued services in their program with no measurement for when success or skill levels will be achieved.
  - c. Partners of IDVR are not generally pleased with the outcomes or services provided through CRPs.
  - d. There is a need for improved consistency across IDVR regions related to policy, forms and expectations of CRPs.
  - e. Participants indicated that CRPs are not clear on their role under WIOA. The learning curve has been challenging for all parties and training/communication to CRPs could improve.
  - f. Implementing fading options for IDVR participants was a positive change in services but understanding of the concept and expectations has been challenging. Additional guidance has been requested by CRPs.
  - g. Both CRPs and IDVR need training in employment opportunities in today's labor market. Use of LMI and strategies for finding non-traditional types of employment are not possible without additional training and support.
6. Largely, CRPs seem to be confused on the difference between IDVR and Extended Employment Services (EES), a separate state funded program under the Division. This appears to be an area of confusion that needs to be addressed.
  - a. CRPs are faced with high turnover and this instability of staff affects the quality of services.
  - b. The perception is that low pay of many CRP staff is the major cause of turnover.
  - c. The quality of job coaches is highly questionable. Many have little more in the way of credentials than a high school diploma.

- d. There is a need for more effective and standardized quality assurance monitoring and evaluation of CRPs.
- e. CRPs have a questionable capacity to serve individuals with language barriers.
- f. There is a need for increased communication between VR and CRPs to gain clarity on expectations and coordination of services.
- g. CRPs should devote more time in training individuals with disabilities on life skills such as hygiene, budgeting, etc.

There are two primary areas where needs are present to establish, develop, or improve CRPs within the state of Idaho:

- 1. Meeting the need of emerging/novel requirements of WIOA and expanding the statewide capacity of CRPs to deliver these services with fidelity (e.g., Customized Employment, Pre-ETS and similar services to youth, Youth Extended Services).
- 2. Monitoring and improving Community Rehabilitation Program performance through a collaborative iterative learning process.

The continuous improvement of CRPs is an ongoing function of IDVR: The establishment, development and improvement of CRPs within the state fall under the purview of IDVR's Planning and Evaluation team. One of P&E's responsibilities within the agency is a comprehensive CRP monitoring process. This process seeks to provide an initial threshold of quality for new CRPs who wish to serve IDVR consumers, provides a maintenance function in retaining a base level quality standard, and a remediation process for CRPs who fall short of standards via a three-year site review process.

- 3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act*

## **Overview**

As previously mentioned earlier in section e, IDVR commissioned a Comprehensive Statewide Needs Assessment (CSNA) beginning late summer of 2019, including an assessment of the rehabilitation needs of youth with disabilities in transition and student need for Pre-Employment Transition Services. Detailed information is provided in section 'e'.

The Idaho Division of Vocational Rehabilitation is an agency of the Idaho State Board of Education and partners with other agencies under the Board through coordination and collaboration.

IDVR has strong relationships with Education agencies throughout the state, including formal interagency agreements with several Local Education Agencies (LEAs), a comprehensive formal interagency agreement which addresses collaborative service provision with the State Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI).

IDVR, ICBVI, and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency. LEAs provide different transition services to students with disabilities for various reasons, adequate funding being one of the major reasons. Therefore, the Division needs to understand the types of transition services that are currently provided by each

LEA to determine what Pre-ETS activities should be considered for students with disabilities at the LEA level.

As a result of that need, IDVR continues coordination activities with educational officials and other state agencies to provide an annual Transition Institute last held in fall of 2021. The fifth annual Transition Institute is scheduled for fall 2022.

Districts will bring teams, that will include a VR Counselor to the Institute to develop specific goal directed plans based on district data to improve Pre-ETS and transition focused education based on district need. This will provide IDVR with the specific criteria to determine which agency (IDVR or LEA) has primary responsibility for providing and paying for transition related services for students with disabilities as well as what additional Pre-ETS should be targeted to each LEA.

Lastly, IDVR has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division's Pre-Employment Transition Plan. The goal on the statewide plan is to develop systems for effective collaboration between students, families secondary and post-secondary educators, rehabilitation counselors, and service providers to evaluate the quality and quantity of transition activities and pre-employment transition services.

#### *k. ANNUAL ESTIMATES*

*Describe:*

##### *1. The number of individuals in the State who are eligible for services*

This estimate includes the number of the individuals in Idaho who experience disabilities, ages 16 and over who are in the labor force according to the American Community Survey 5-Year Estimates (Table S1811, 2015, 2016, 2017, 2018, and 2019). The latest currently available census data shows 213,955 Idahoans with disabilities age 16 and over with 69.4 percent of individuals not in the labor force, yielding an estimate of 65,470 Idahoans with disabilities participating in the labor market. Forecasting suggests there will be 67,942 eligible Idahoans in FFY 2022 and 70,624 FFY 2023. These numbers reflect a slight reduction in the overall labor force participation rate of Idahoans with Disabilities from 2018 and 2019 ACS 1-year estimates.

Year	Census Estimate	Forecast Population	Lower Bound (95%)	Upper Bound (95%)
ACS 2017	59921			
ACS 2018	61526			
ACS 2019	65470	65470		
FFY 2022		67942	66592	69292
FFY 2023		70624	69247	72000
FFY 2024		73305	71871	74739

##### *2. The number of eligible individuals who will receive services under:*

###### *A. The VR Program;*

The number of customers served by IDVR under WIOA has diminished. Historic rates of low unemployment across Idaho, new mandates created by WIOA, and COVID-19 are likely factors in this downturn. The Division has launched an outreach strategy to re-engage former customers, and Idaho's unemployment rate has returned to near pre-pandemic levels with a November 2021 preliminary rate of 2.6 percent (BLS.gov). While it can be difficult to accurately predict customer application rate in the unique conditions presented by the current labor market, the Division

believes the downward trend in applications and plans will end and we can expect an unknown increase in applications for VR services. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent service volume increases to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize the three percent volume of services increase for FY 2022 and the five percent volume of services increase for FY 2023. Due to uncertainty surrounding inflationary pressure, the Division has used FY 2021 one-year actual costs rather than the alternate five-year average cost model to better approximate higher anticipated costs.

IDVR has 5073 participants in plan and receiving services in the most recently completed fiscal projection model. This includes 2010 participants under Most Significant Disability (MSD), 1675 participants under Significant Disability (SD), and 1388 participants classified under the Disability (D) severity categories.

#### **Estimates of Customers in Plan Status (Receiving Services) for IDVR**

	MSD	SD	D	Total in Plan
FFY 2021 Actual (100%)	2010	1675	1388	5073
FFY 2022 Estimate (103%)	2070	1725	1430	5225
FFY 2023 Estimate (105%)	2111	1759	1457	5327

#### *B. The Supported Employment Program; and*

As noted in the prior section, the Division believes the downward trend in applications and plans will end and we can expect an increase in applications for VR services. This expectation extends to the SE program. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize the three percent volume of services increase for FY 2022 and the five percent volume of services increase for FY 2023.

	SE Participants in Plan	Total Annual Cost	Anticipated Title VI Funds	SE Title I Funds
Current (100%)	459	\$762,187	\$300,000	\$462,187
FFY 2022 (103%)	473	\$785,052	\$300,000	\$485,052
FFY 2023 (105%)	482	\$800,296	\$300,000	\$500,296

The Division expects to receive \$300,000 in Title VI Supported Employment funds for PYs 2022 and 2023. As projected expenditures exceed Title VI funds, The Division will supplement Title VI SE services utilizing Title I VR funds. The Division does not anticipate any issues expending the \$150,000 set aside for SE services, and Extended Services to students and youth.

Note: This section includes estimates for SE qualifying services only (i.e., job coaching). Supportive services, or services beginning prior to job placement are not included in this section.



*C. Each priority category, if under an order of selection.*

IDVR is not operating under an Order of Selection. IDVR will continue to monitor fiscal conditions as impacted by WIOA to determine whether or not an Order should be established and/or implemented. IDVR currently operates three-tier significance of disability scale in line with Federal D, SD, and MSD reporting guidelines.

*3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and*

N/A

*4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.*

As noted in K.1 and K.2, the Division believes we can expect an increase in applications for VR services. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize an FFY 2021 actual basis, the three percent volume of services increase for FY 2022, and the five percent volume of services increase for FY 2023 for projections.

IDVR's fiscal unit conducts projections annually down to severity category. While IDVR is not operating under an Order of Selection, this exercise better prepares the Division to detail projections at the category level should it become necessary. Additionally, IDVR's fiscal unit conducts fiscal projections using two models. One is a scenario using the five-year average cost per customer, and the second is a scenario using current YTD average costs per customer.

Due to uncertainty in projections due to conditions presented by COVID-19 including excessive inflationary pressures which may or may not be transitory, IDVR has selected the current year average costs for projections in this state plan to reflect higher anticipated costs in the coming two-years. As additional time elapses under the current SE provision model, and conditions normalize, the Division will consider switching these estimates to the five-year projections. For the purposes of this plan the division believes the YTD projections represent the best model to project expenditures under current conditions.

FFY 2021 Actual Service Costs (100% Basis)

	MSD	SD	D	Total
Estimated in Plan Status	2010	1675	1388	5073
Estimated Cost per Plan	\$1,644.36	\$1,546.44	\$1,374.36	\$1,538.16
Estimated Customers on SE Plan	459	N/A	N/A	
Average SE Services Cost	\$1,660.54			
Estimated SE Annual Expenditure	\$762,186.60			\$762,186.60
Non-SE Plan Expenditure	\$2,542,977.00	\$2,590,287.00	\$1,907,611.68	\$7,040,875.68
Total Estimated Annual Plan Cost	\$3,305,163.60	\$2,590,287.00	\$1,907,611.68	\$7,803,062.28

FFY 2022 Service Cost Estimates (103%)

	MSD	SD	D	Total
Estimated in Plan Status	2070	1725	1430	5225
Estimated Cost per Plan	\$1,644.36	\$1,546.44	\$1,374.36	\$1,538.16

	MSD	SD	D	Total
Estimated Customers on SE Plan	473	N/A	N/A	
Average SE Services Cost	\$1,660.54			
Estimated SE Annual Expenditure	\$785,052.08			\$785,052.08
Non-SE Plan Expenditure	\$2,618,773.12	\$2,667,609.00	\$1,965,334.80	\$7,251,716.92
Total Estimated Annual Plan Cost	\$3,403,825.20	\$2,667,609.00	\$1,965,334.80	\$8,036,769.00

FFY 2023 Service Cost Estimates (105%)

	MSD	SD	D	Total
Estimated in Plan Status	2111	1759	1457	5327
Estimated Cost per Plan	\$1,644.36	\$1,546.44	\$1,374.36	\$1,538.16
Estimated Customers on SE Plan	482	N/A	N/A	
Average SE Services Cost	\$1,660.54			
Estimated SE Annual Expenditure	\$800,295.81			\$800,295.81
Non-SE Plan Expenditure	\$2,670,948.15	\$2,720,187.96	\$2,002,442.52	\$7,393,578.63
Total Estimated Annual Plan Cost	\$3,471,243.96	\$2,720,187.96	\$2,002,442.52	\$8,193,874.44

Note: IDVR is not on an order of selection, however, the Division prepares projections utilizing severity categories to conduct more accurate fiscal forecasting in the event OoS implementation was indicated.

### *I. STATE GOALS AND PRIORITIES*

*The designated State unit must:*

- 1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions*

IDVR and the State Rehabilitation Council (SRC) revised/modified the goals and priorities based on the recently completed Comprehensive Statewide Needs Assessment (CSNA). New program goals and priorities reflect and align with program changes resulting from WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

IDVR, in collaboration with the SRC, will continue to develop specific strategies that are in alignment with these goals and priorities.

- 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs*

The goals and priorities for the Division are reviewed annually and revised as necessary based on input from a variety of sources including the SRC, combined plan partners, the State Independent Living Council (SILC), the Client Advocacy Program (CAP), Tribal VR representatives, findings and recommendations from monitoring activities conducted under Section 107, and the IDVR management team, including management at the regional level. Additionally, the goals and priorities are informed by the Comprehensive Statewide Needs Assessment (CSNA) which is conducted every three years.

The Division evaluates progress multiple times a year during Idaho's Strategic Plan development cycle and Idaho's Performance Measurement report. These occur approximately every six months and the Performance Measurement report is dependent upon the goals and measures established in the Strategic Plan. The State of Idaho limits the number of measures contained in the performance evaluation report to a subset of the strategic plan elements to better focus reports on those data which are impactful to the program. The State Board of Education and the Division of Financial

Management oversee these requirements and include explicit benchmark criteria be established for performance expectations. The most current approved Strategic Plan and Performance Measurement Report document are available on IDVR's website:

<https://vr.idaho.gov/publications/>. IDVR includes RSA's Primary Performance Indicators as core performance measures in our annual strategic plan and reporting cycle. In general, the agency seeks to maintain or improve performance across these indicators, unless a specific target has been negotiated with RSA.

### **Goal 1 - Provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential**

- Priority 1 - Expand, monitor, and improve pre-employment transition services (Pre-ETS) to students with disabilities and similar services to youth.
- Priority 2 - Provide a comprehensive array of services to individuals with disabilities, including individuals with Most Significant Disabilities (MSD).
- Priority 3 - Hire and retain qualified staff to deliver quality vocational rehabilitation services.
- Priority 4 - Improve access to quality Career Pathways tools to inform customer career choice. Improve appropriate utilization of Labor Market Information in concert with these tools.
- Priority 5 - Improve overall quality of CRP services.

### **Goal 2 - Improve VR program efficiency through continuous quality improvement activities**

- Priority 1 - Meet or exceed negotiated targets on Primary Performance Indicators 1-5 established by the US Department of Education, Rehabilitation Services Administration.
- Priority 2 - Continue to monitor IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council and work together on strategies to increase the overall satisfaction rate.
- Priority 3 - Maximize the utilization and documentation of comparable benefits.
- Priority 4 - Continue efforts to align IDVR activities with the workforce development system.
- Priority 5 - Evaluate IDVR assessment utilization.
- Priority 6 - Continue to monitor and adapt the internal control system of the agency to strengthen program compliance and improve program outcomes.

### **Goal 3 - Improve outreach and services to IDVR business customers**

- Priority 1 - Increase business utilization of IDVR expertise and services.
- Priority 2 - Evaluate and realign agency structure to meet the needs of business customers.

*3. Ensure that the goals and priorities are based on an analysis of the following areas:*

*A. The most recent comprehensive statewide assessment, including any updates;*

IDVR published its last completed a CSNA in April 2020 which includes an assessment of Pre-ETS and youth need as well as considering the needs of business.

The Division's goals and priorities reflect those areas where the Division plans to focus efforts for improvement and are directly informed by the CSNA. The Division worked closely with Idaho's State Rehabilitation Council using the results of the latest Comprehensive Statewide Needs Assessment and have updated these goals and priorities with language that meets the direction provided by the SRC.

*B. The State's performance under the performance accountability measures of section 116 of WIOA; and*

Title IV Vocational Rehabilitation programs are required to set estimated levels of performance for all primary performance indicators under this Combined State Plan with the exception of the Employer Satisfaction indicator. RSA-TAC-20-02 provides guidance on setting expected levels of performance for these indicators. While preliminary data now exists for all required indicators per TAC-20-02, historical data for many of these elements must still be collected before accurate forecasting can occur. IDVR anticipates being able to employ forecasting for projections across all indicators in the next plan, and anticipates the subsequent two-year revision will provide far more reliable estimates:

- Employment in the 2<sup>nd</sup> quarter
- Employment in the 4<sup>th</sup> quarter
- Median earnings
- Credential attainment
- Measurable skill gains
- Effectiveness in serving employers.

Reliability and Validity Activities:

The Division has an established data sharing agreement, providing access to in-state wage data along with the State Wage Interchange System (SWIS) data as a non-access PACIA. IDVR has access to Idaho's Statewide Longitudinal Data System and is utilizing some elements where timely imputation is possible. The Division is working closely with other core WIOA partners on a Workforce Development Quality Initiative (WDQI) grant which seeks to remove barriers through automation and reduce the time required to access this data. Work continues on the WDQI initiative, and additionally the Division has dedicated staff to the DataLabs project alongside other core WIOA programs in Idaho which further seeks to advance co-enrollment.

The Division continues to improve our data validation and accuracy efforts by:

- Systematic utilization of RSA provided tools (Quarterly Dashboards/Other Measures that Matter/RehabData Workgroup products) to validate data and identify errors and areas for improvement.
- Dialogue with our case management system vendor, and affiliated community of practice for technical assistance, adaptation, and improvement of the system under WIOA

- Regularly conducted data validation activities, working with the field to resolve identified errors and advancing strategies which provide strong automatic internal control where possible

The Division's Information and Communication strategy promotes continuous improvement by informing staff each quarter of errors and anomalies detected by this strategy and working with staff to fix errors and fix or certify anomalies. The expectation is that errors and anomalies for staff working through these corrections will diminish over time, and annual case file reviews and quarterly data anomaly checks indicate this is occurring; overall IDVR has experienced reduced errors and increased compliance across elements gauged by these activities

The Division will continue to collect and analyze data to inform expected levels of performance to use for future negotiations with RSA. Currently, projecting performance improvements accurately can be difficult due to lack of historical data surrounding some of these indicators. Dissemination and utilization of 116 primary performance data is reinforced at IDVR through various activities including quarterly reviews of PPIs and Other Measures by executive leadership, and changes to agency priorities, goals, and objectives are driven, in part, through an understanding of Division performance across these items. Goal 2, Priority 1 specifically addresses continuous quality improvement as gauged by section 116 primary performance indicators.

Emerging national data from CSAVR on these elements (PY 2020) suggest Idaho Title IV programs are performing well as a whole. (RSA, 2021):

- Employment in the 2<sup>nd</sup> quarter: 59.9 percent, 1<sup>st</sup> quartile (4<sup>th</sup> overall of 52)
- Employment in the 4<sup>th</sup> quarter: 57.3 percent, 1<sup>st</sup> quartile (4<sup>th</sup> overall)
- Median earnings: \$4,259, 2<sup>nd</sup> quartile performance well outpaces Idaho's expected median earning performance as a historically 4<sup>th</sup> quartile median wage state for overall wages.
- Credential attainment: 40.3 percent, 1<sup>st</sup> quartile performance, (7<sup>th</sup> overall)
- Measurable skill gains: 52.6 percent, 2<sup>nd</sup> quartile performance, (15<sup>th</sup> overall)

*C. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.*

The Division has worked closely with RSA on their data dashboard information and utilizes the dashboard to identify and fix inaccuracies in the data collection process and for performance improvement.

IDVR's last 107 monitoring was conducted in 2021, and the Division received a final report on March 7, 2022. Consequently this report was received after the State Goals and Priorities were developed for this iteration of the plan. However IDVR did benefit from numerous preliminary recommendations and informal discussions during the course of the review which did inform immediate action. The Division has already committed to action across several of these recommendations and has developed initial responses on two findings contained in the draft report.

The Division's finding on residency duration language has been addressed within policy and training has occurred. The Division agreed with both findings and is in the process of developing a corrective action plan for the second finding on deficiencies in the contract monitoring process.

IDVR will formally respond to RSA with corrective action within the 45 days required by the monitoring report.

*m. ORDER OF SELECTION*

*Describe:*

*1. Whether the designated State unit will implement and order of selection. If so, describe:*

*A. The order to be followed in selecting eligible individuals to be provided VR services*

IDVR is not currently in order of selection.

*B. The justification for the order*

IDVR is not currently in order of selection.

*C. The service and outcome goals*

IDVR is not currently in order of selection.

*D. Time within which these goals may be achieved for individuals in each priority category within the order; and*

IDVR is not currently in order of selection.

*E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities*

IDVR is not currently in order of selection.

*2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment*

IDVR is not currently in order of selection.

*n. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS*

*1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services*

IDVR received \$300,000 in Title VI, Part B funds in FFY 2022. These funds are made available for all Supported Employment cases statewide. IDVR focused Title VI, Part B funds on direct case service provision for job coaching exclusively, including \$150,000 for SE youth. The Division has established a process to provide Youth Extended Services using Title I funds after exhausting Title VI funds.

The Division anticipates that adult SE funds and youth SE funds will be exhausted annually, and the Division will continue to provide these services under general Title I funds.

Since this population is by definition MSD, they would also continue to receive services, even in the event that IDVR implemented an Order of Selection, unless Order was expanded to temporarily suspend services to part or all of the MSD population. No existing fiscal projection would indicate this action.

*2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:*

*A. The provision of extended services for a period not to exceed 4 years; and*

IDVR reserves 50 percent of Title VI Part B funds for the provision of Supported Employment and Extended Services to youth. IDVR's expenditures on SE services far outstrips the funds allocated under Title VI Part B. The Division does not anticipate any problems expending these funds as authorized.

The Division has developed policies to ensure that Youth Extended Services (YES) can be provided up to four years as needed for individuals under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. The Division will continue to support YES with Title VI or Title I funds, as required by WIOA, and will continue to leverage other sources of extended services. Youth Extended Services are only for individuals who are MSD and have completed SE services.

*B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.*

IDVR utilizes the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The Division will continue to work closely with each program overseeing these resources to streamline our referral process and improve utilization of this external source of extended services funding.

#### *o. STATE'S STRATEGIES*

*Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):*

*1. The methods to be used to expand and improve services to individuals with disabilities*

The Division's Statewide Assessment (j) outlines an array of potential priorities to expand and improve services to Idahoans with disabilities. Initial innovation and expansion activities under WIOA were focused primarily on establishing new and modified services to conform with the requirements of the regulations. While the Division will continue to expand these services in some areas, there will be an increasing focus on raising the quality of services to customers under all priorities listed under Goal 1 in section (l) of this plan.

IDVR will continue to maintain the two ongoing primary innovation activities, supporting the activities of both the State Rehabilitation Council (SRC) and the State Independent Living Council (SILC). The SRC serves as IDVR's advisory council and together with the Division and the CSNA inform the goals, priorities, and strategies for agency.

Additionally, IDVR in PYs 2022-2023 will continue limited pilot projects under Pre-ETS while continuing to monitor and refine those programs now being offered at a statewide level. More

detail on plans for improving services to students and youth can be found under part four of this section.

The Division had committed to a sustained campaign to improve frontline services to individuals with disabilities offered by Idaho's Community Rehabilitation Providers in the 2020 state plan update. Unfortunately, these efforts were placed on hold as the agency pivoted to adapt to the COVID-19 pandemic. However, the Division has reclassified an FTE and hired a dedicated Community Rehabilitation Program Manager to lead these improvements.

Following the creation of new policy on Supported Employment (SE) under WIOA to address regulatory changes pertinent to SE and an initial wave of internal staff training, the Division conducted multiple activities to collect input on services to individuals with MSD.

Expansion of service delivery options remains an expressed need in more rural and remote areas of Idaho, while indicated improvements were for traditional CRP and Pre-ETS services remains an agency priority, including a need for more relevant community-based assessment options, stronger local area collaboration between IDVR and providers, and timeliness to CRP service initiation. More detail on the CRP improvement strategy can be found under part five of this section "plans for establishing, developing, or improving community rehabilitation programs within the State."

*2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis*

IDVR is committed to expanding the availability and provision of Assistive Technology. The Division has an ongoing partnership with the Idaho Assistive Technology Project (IATP) housed at the Center on Disabilities and Human Development at the University of Idaho. Through this partnership IATP provides continuing education and technical assistance to IDVR personnel via face to face and distance methods. An IDVR staff member maintains representation on IATP's Advisory Council.

The Division has an agreement as of November 2020, with the Idaho State Department of Education (SDE) outlining shared responsibilities and implementing a program which:

1. The parties anticipate that LEAs will purchase any assistive technology/equipment determined through the IEP process to be necessary for the education program of individual students who are enrolled in the district.
2. VR will purchase any assistive technology/equipment determined through the IPE process to be necessary to access Pre-Employment Transition Services or VR employment outcome.

Additional AT resources for staff training include the Idaho Training Clearinghouse, which hosts multiple resources and is funded by SDE's Special Education Division.

IDVR has provided counselors who serve deaf and hard of hearing customers with the AT needed to enhance communication.

*3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program*



IDVR has exceeded a ratio of minority service rate to non-minority service rate of 1.00 for a program year the first time under WIOA achieving a rate of 1.006 for PY 2020. Current data for PY 2021 show a slight regression to .974 as of December 2021. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach are all potential contributors to this trend.

IDVR's Administrator has championed outreach as a priority moving into 2022. By early January 2022, all Regional Managers will have developed a region-specific outreach strategy.

The identification and service estimates for minority populations in Idaho are derived from population estimates and internal agency data on customers.

The Hispanic population is Idaho's largest minority group at 12.8 percent, and 11 percent of all Idahoans identified as having Mexican origin with 1.8 percent for all remaining Hispanic origin subcategories. (2019 ACS Demographic and Housing 1-Year Estimate). Internal agency data suggests this population remains underserved representing 8.41 percent of total applications in PY 2019 and 8.76 percent in PY 2020. The Division is aware of the sustained gap in both applications and plans for this population and has included an initiative in this plan to explore/expand Spanish language options for customers across Idaho. COVID-19 has placed this initiative on temporary hold, but the Division continues to plan for this expansion. As noted in section j, Idaho's Hispanic population is significantly younger, and the agency should expect a significant increase service rates as the bulk of this population enters working age.

Further analysis of outreach and service delivery by race may be confounded due to low populations in remaining categories, however the following table presents data for Race alone or in combination with one or more other races from latest available ACS Demographic and Housing Estimates (DP05) which best aligns with IDVR's internally available data:

	ACS 2019	PY 2019	PY 2020
White	92.5%	95.46%	95.50%
Black or African American	1.2%	2.23%	2.41%
American Indian and Alaska Native	2.4%	3.95%	3.30%
Asian	2.5%	1.08%	1.33%
Native Hawaiian and Other Pacific Islander	0.4%	0.56%	0.68%
Some other race	4.5%	--	--

Idaho's demographics are changing, and Idaho was the second fastest growing state relative to population in the past 10 years, with the population growing over 17 percent in the decade (US Census Bureau, 2020). Idaho was the fastest growing state by percentage in the last year, growing 2.9 percent and was ninth in total numeric growth at 53,151. While Idaho is traditionally a major state for resettlement in Regions 3, 4, 7 and 8, net international migration has slowed significantly under the COVID-19 pandemic (with the primary driver of Idaho's recent population increase coming from net domestic migration). Regardless of unique present factors, IDVR remains committed to refugee outreach efforts: In order to best understand the needs of this population,

IDVR conducts joint staff training in conjunction with the Agency for New Americans. IDVR works maintains regular contact and outreach with staff at the International Rescue Committee refugee organization and all three resettlement agencies in the Treasure Valley and Magic Valley regions. The Division maintains contact with Family Medicine, a medical provider to newly arrived refugees in the in these regions to coordinate referrals.

Additionally, IDVR conducts ongoing outreach activities to meet the needs of the Spanish speaking population statewide. A number of these individuals engage in migrant seasonal farm work. The Division works collaboratively with IDOL, the Community Council of Idaho (a rural-centered, nonprofit serving Latinos in Idaho, and the Idaho Division of Hispanic Affairs to identify these individuals and processes to best conduct outreach activities.

The Division has launched its I&E priority on CRP quality improvement and rate re-evaluation. A new CRP manager has been hired and is currently in the process of project planning prior to engaging partners in preliminary efforts, including but not limited to rate re-evaluation, quality outcome payments, ACRE certification, heightened and clarified expectations, and an updated evaluation and monitoring strategy for CRPs.

IDVR is furthering Hispanic outreach efforts through increased involvement with LEAs and in rural areas across Idaho: These two strategies address the substantial concentrations of both Hispanic youth and Idaho's Hispanic population to best leverage outreach opportunities:

LEAs:

Hispanic students made up 18% of K-12 enrollment in 2019-2020 but accounted for 31% of enrollment growth in the previous five years. From 2014-2015 to 2019-2020, Hispanic enrollment increased 12%, and non-Hispanic enrollment increased 5%. -The Hispanic Profile Data Book for Idaho 5<sup>th</sup> Ed. (2021).

Rural Communities: the I-84/I-86/I-15 Interstate Highway Corridors:

Hispanics are heavily concentrated in the southern part of the state but live in all 44 counties. As of 2019, 90% lived south of a line from Payette County in the west to Bonneville County in the east. Half live in just three counties: Canyon, Ada, and Bonneville. -The Hispanic Profile Data Book for Idaho 5<sup>th</sup> Ed. (2021).

Idaho Department of Labor has an existing Hispanic outreach program which conducts targeted outreach to these communities with heavy concentration of Hispanic and migrant seasonal farm worker population. IDVR plans to better understand the existing outreach efforts under IDOL and will explore opportunities for collaboration or adaptation/modification of this approach where indicated.

The Division conducts various outreach activities to identify and involve individuals with disabilities from underserved backgrounds. These include but are not limited to:

- Monthly participation in the Amigo Round Table hosted by the Mexican Consulate
- Working with community based mental health programs to identify leads for potential outreach
- Continuing meetings with Boise State University's Hispanic equivalency recruiter
- Meeting with the Idaho Department of Health and Welfare's bilingual staff as well as ongoing meetings with DHW's Targeted Service Coordinators to identify potential referrals

- Participation in the multi-partner Refugee Employment Networking and Training group hosted by the Idaho Department of Labor
- Collaboration with the College of Southern Idaho Refugee Center for referral for refugees with disabilities needing VR services

IDVR also conducts tribal outreach, per agreement, in conjunction with 121 projects to the four tribes located in Idaho and the substantial American Indian population residing in the Treasure Valley.

IDVR has a representative on the Sho-Ban Job Fair and Hiring Event committee in partnership with Shoshone-Bannock VR, IDOL, tribal leadership and employers which connects prospective employees to employers.

IDVR has connected with the ESL coordinator at the College of Western Idaho who disseminates information to VR staff on free English language classes and training opportunities for customers.

IDVR regularly engages with qualified interpreters for a variety of languages to better serve VR clients with limited English proficiency.

Idaho currently has seven Community Rehabilitation Programs who hold 14(c) special wage certificates (down from eight last plan). Four are currently active with three listed as pending renewal by US DOL W&H as of December 2021. IDVR has developed a Career Counseling and Information & Referral process which is delivered multiple times per year at each certificate holder sites. To meet regulatory requirements of the Division under 397, IDVR encourages individuals as a part of ongoing Career Counseling and Information & Referral, to engage with the Division if interested in pursuing Competitive Integrated Employment as a part of their informed choice. The Division anticipates the decline in 14(c) subminimum program utilization will continue over time.

*4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services)*

The expansion, provision, and evaluation of various Pre-ETS activities are ongoing. Continued collaboration with the SDE and LEAs alongside feedback from customers and parents/guardians when applicable are instrumental in better understanding which services should be continued, modified, or ended. Activities like the Transition Institute will bring these stakeholders together and allow for the collection of rich qualitative data to further inform improvements to these services.

The Transition Coordinator will also use the district plans that are created at the Institute to identify specific transition service needs of each district. This will allow VR to target districts who need intensive levels of support as priority districts. VR will also continue to provide targeted and universal support to districts who have identified lower levels of need.

IDVR has evaluated our effectiveness in our internal VR structure and Pre-ETS performance and have subsequently identified additional strategies to implement to positively impact the number of students receiving Pre-ETS services as well as the number of services delivered. IDVR believes that the following strategies will also increase our effectiveness in coordinating with school districts for the purpose of positive student outcomes.

IDVR implemented new Area Transition Counselors. IDVR divided the state into three areas for these positions to serve. The positions serve both students directly as well as coordinate with school districts and VR staff. After this first year of having the Area Transition Counselors in place, IDVR has further determined that there is a need for additional restructuring to better serve the students of Idaho. IDVR is creating new Pre-ETS Counselor roles to serve each regional area of Idaho. This new caseload structure will provide a focus for staff to work more closely with the Area Transition Counselors and the Statewide Transition Coordinator to implement and deliver quality services for their local community schools in a more effective manner.

Toward these ends, expected outcomes include an increase in student participation in Pre-ETS, an increase in the number of students participating in Pre-ETS based on student need, an increase in the number of students achieving his or her employment outcome following engagement with IDVR.

IDVR is evaluating the following services and partnerships

- Post-secondary partnerships
- Summer paid work experience
- Local Education Agency partnerships
- Idaho Educational Services for the Deaf and Blind partnership
- Idaho Parent Unlimited partnership

*5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State*

The Division is committed to engaging in innovation and expansion activities designed to establish, develop and/or improve Community Rehabilitation Programs (CRPs) across Idaho. Based on sustained demonstrated need highlighted in the past two Comprehensive Statewide Needs Assessments and aligned with the joint goals of IDVR's administration and IDVR's State Rehabilitation Council the Division is currently exploring a number of potential initiatives to promote quality CRP outcomes including but not limited to:

- Promoting the Professionalization of CRP Staff:
  - An exploration of established training models used by CRPs/other DSUs to promote initial competence when providing services to people with disabilities
  - An exploration of continuing education requirements used by CRPs/other DSUs to promote career-long learning and quality outcomes
  - Formalization of initial and on-going education requirements for providers who want to serve IDVR customers
- Reconciling IDVR's CRP Fee Schedule for WIOA Expectations:
  - Evaluation of rates for services to include an assessment of potential new competency and training requirements
  - Formalizing new rates for services based on enhanced education and competency requirements
  - Expanding options for outcome-based results/quality outcomes for IDVR's customers who use CRPs.

- Clarifying Expectations/Information and Communication:
  - Establishment of new requirements and guidance around IDVR expectations for individualized service provision, documentation, and more tailored/personalized community-based evaluations.
  - Explore a potential streamlining of requirements to serve rural and remote communities, allowing more potential providers with a lower barrier to entry in underserved/unserved areas.
  - Due to persistent confusion in the CSNA: Work with Extended Employment Services to help CRPs, customers, and parents/guardians understand Competitive Integrated Employment requirements of IDVR and how the programs intersect.
- Strengthen the Feedback Loop with CRPs:
  - Work with partners to clarify agency expectations and requirements through continued development of the CRP Manual.
  - Overhaul IDVR's CRP Monitoring Protocol to align with the requirements of WIOA and increase relevance to frontline staff and CRPs
  - Continue to engage with CRP partners to address ongoing and emerging issues
  - Explore performance accountability options following implementation of heightened requirements
  - Provide a single point of contact and sufficient energy to CRP improvements through the new CRP Manager position.
- Targeted Evaluation of CRP Services for Effectiveness:
  - Work to understand quality of assessments conducted by CRPs
  - Evaluate quality of assessment sites (where applicable) to the individualized personal/vocational needs of customer
  - Evaluate documentation of fading and stability

To further develop positive working relationships with Community Rehabilitation Providers (CRPs) and to enhance service delivery for customers, IDVR participates in CRP association meetings or hosts alternate meetings when necessary. IDVR's dedication of an FTE to a CRP Manager will also help expand communication quantity and quality with these critical partners, helping in part to address the needs identified in the CSNA and CSS results.

IDVR is engaged in a structured program evaluation strategy to maintain and improve the quality of services provided to customers through community rehabilitation providers statewide.

IDVR generates annual CRP employment reports for each vendor who provided services in the past fiscal year. The tool provides information to customers in order to enhance informed choice while they are selecting a CRP. These reports contain aggregated data gathered from our case management system. Information provided includes number of cases served, employment outcomes, average hourly wage of consumers who exit the program successfully, average hours worked per week per consumer, average annual earnings per consumer, employer sponsored benefit rate of those successful closures, the top five occupational outcome categories, and the primary impairments of those served. Counselors provide this information in a manner the consumer can understand to help promote informed choice.

As a function of its consumer satisfaction survey, IDVR collects information on the satisfaction of consumers who received services from CRPs through an enhanced section of the instrument. The Division continues to explore options to improve this instrument.

*6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA*

IDVR is able to provide expected levels of performance for all primary performance indicators under this Combined State Plan.

IDVR currently has strong relative performance falling in the first or second quartiles across all 116 performance accountability measures. Idaho is experiencing record growth and one of the lowest unemployment rates in the nation heading into 2022. The Division is engaging with partners in a number of ways to improve state performance:

The Department of Labor is a recipient of a Workforce Data Quality Initiative (WDQI) grant and continues working with IDVR and other core programs to develop policy and methods to automate data sharing to help all programs for performance reporting purposes. Additionally, the Division is participating in the DataLabs technical assistance project with the Idaho WDC and representation from WIOA programs. This project is exploring methods to improve appropriate referral and indicate meaningful co-enrollment opportunities between programs.

IDVR has an agreement to access Idaho's Statewide Longitudinal Data System (SLDS) in order to pull education related data elements. The Division is now able to impute limited SLDS data, however receiving data in time to meet reporting requirements continues to prohibit greater utilization of the SLDS system.

The Division has used the RSA Data Dashboards, RehabData Work Group data and data published by RSA as tools to better understand and improve performance under Section 116.

Idaho Title-IV Expected Levels of Performance PY 2022 and PY 2023

RSA-TAC-20-02 notes: there are many ways to define continuous improvement as related to state or national program circumstances. For example, continuous improvement may reflect:

- an increase from the levels of performance previously attained;
- increases in percentile rankings of levels of performance either nationally or among similar states;
- a change in service strategy and delivery, including more progressive or innovative approaches;
- a change in the intensity or comprehensiveness with which customers are served; or
- a maintenance of previous performance for the top performing states.

Idaho Title IV programs are exploring various data-driven processes to utilize for establishing expected levels of performance prior to negotiation with RSA.

Two years ago, the Idaho Title-IV programs employed a data-driven comparative benchmarking exercise utilizing current data published by the RehabData Workgroup to establish expected levels for the last state plan update. As new RehabData products have not yet been issued to replicate the benchmarking exercise, Title IV programs are exploring other data-driven approaches to target

setting. The CDC's National Center for Health Statistics has "developed statistical methods and analytical tools to assist in setting transparent, data-driven targets" (NCHS, 2020, p. 1).

Target-Setting Methods in Healthy People 2030 outlines the following approaches in setting data-driven targets:

- Percent improvement
- Percentage point improvement
- Projection
- Minimal statistical significance
- Maintain consistency with national programs, regulations, policies, or laws
- Maintain the baseline

While developed to promote stronger target setting for the Healthy People project, this systematic approach to target setting provides a framework for Idaho to set data-driven targets for all primary performance indicators. Target-Setting Methods in Healthy People 2030 document presents the decision tree for target setting from this project.

Additionally, some recent comparative information on states is available via the November 2021 CSAVR presentation by RSA. Idaho Title-IV programs include this comparative data to characterize relative performance when establishing expected levels of performance to meet continuous improvement expectations defined by RSA.

Projections are based on the performance data for PY 2020 Idaho Title IV programs from the ETA-9169.

### **Rationale for Expected Targets for Idaho Title-IV Programs:**

#### **Employment Rate-2nd Quarter after Exit**

- TAC-20-02 notes a maintenance of previous performance for the top performing states is an acceptable target.
  - Idaho ranks 4<sup>th</sup> Nationally/1<sup>st</sup> Quartile (RSA, 2021)
- HP2030 notes that the target-setting method of maintaining the baseline is used when an objective is already at a desired level nationally or because the objective is moving or expected to move in an undesirable direction.
  - Idaho unemployment is at a historic low

Idaho proposes a baseline performance extension for employment rate 2<sup>nd</sup> quarter after exit. PY 2020 data from RSA's CSAVR presentation show Idaho is 4<sup>th</sup> in the nation in both 2<sup>nd</sup> quarter after exit (58.9 percent). December 2021 preliminary unemployment figures show Idaho with the 4<sup>th</sup> lowest unemployment rate at 2.4 percent (BLS.gov, 2022). This is a series low unemployment rate for Idaho and the series began in 1976. Because of these conditions, Idaho believes maintaining performance across 2<sup>nd</sup> and 4<sup>th</sup> quarters is a reasonable expectation.

#### **Employment Rate-4th Quarter after Exit**

- TAC-20-02 notes a maintenance of previous performance for the top performing states is an acceptable target.

- Idaho ranks 4<sup>th</sup> Nationally/1<sup>st</sup> Quartile (RSA, 2021)
- HP2030 notes that the target-setting method of maintaining the baseline is used when an objective is already at a desired level nationally or because the objective is moving or expected to move in an undesirable direction.
- Idaho unemployment is at a historic low

Idaho proposes a baseline performance extension for employment rate 4<sup>th</sup> quarter after exit. PY 2020 data from RSA's CSAVR presentation show Idaho is 4<sup>th</sup> in the nation in 4<sup>th</sup> quarter after exit (57.3 percent). December 2021 preliminary unemployment figures show Idaho with the 4<sup>th</sup> lowest unemployment rate at 2.4 percent (BLS.gov, 2022). This is a series low unemployment rate for Idaho and the series began in 1976. Because of these conditions, Idaho believes maintaining performance across 2<sup>nd</sup> and 4<sup>th</sup> quarters is a reasonable expectation.

#### Median Earnings-2nd Quarter after Exit

Median earnings have been benefiting from low unemployment in Idaho and the state can expect to see this trend continue in the near term as employers compete for talent. Idaho has seen some vacillation in median wage values across quarters now available for analysis. Data available is not yet suitable for projections however with confidence intervals ranging between  $\pm 11.1$ -13.2%. Idaho comparative performance in Median Earnings suggests an outperformance at \$4,259, placing the state in the second quartile (RSA, 2021). Idaho is traditionally a 4<sup>th</sup> quartile median earnings state, although continues moving in the right direction. Regardless of this outperformance, Idaho Title IV programs are proposing expected earnings increase of 2.5 percent a year following the TSM percent improvement method.

#### Credential Attainment

Idaho performance was in the first quartile and 7<sup>th</sup> overall for PY 2020 (RSA, 2021). Regardless of this performance, the Idaho Title IV programs are committing to significant improvement targets within this two-year update.

Idaho has recently corrected reporting issues with accurately reporting Credential Attainment and consequently has realized a substantial gain as reporting has come online. Since accurate trend data for this measure is unavailable, Idaho is utilizing the TSM percentage point improvement method. This method articulates 10-year goal setting for both target effect sizes of 0.1 and 0.2 to correspond with 10 percent and 20 percent improvement, respectively. The benefit of using this approach is that it is sensitive to projections closer to the top or bottom of the spectrum.

The NCHS Statistical Note on Target-Setting Methods states:

Targets based on effect size of 0.1 For percentages, when the target is set based on a directional effect size of  $h = 0.1$ , the result is a 1–5 percentage point improvement from baseline, depending on the value at baseline:

- For baseline values in the range 25%–75%, the targeted change is 4–5 percentage points. Note that for baseline values around 50%, a targeted change of 5 percentage points corresponds to a 10% change from baseline (over a 10-year period).



Targets based on effect size of 0.2 When the target is set based on a directional effect size of  $h = 0.2$ , the result is a 1–10 percentage point improvement from baseline, depending on the value at baseline:

- For baseline values in the range 25%–75%, the targeted change is 8–10 percentage points. Note that for baseline values around 50%, a targeted change of 10 percentage points corresponds to a 20% change from baseline (over a 10-year period).

The equivalent annual performance gain using the percent point improvement guidelines provided would indicate that a two-percent annual percentage point gain is suitable for utilization in credential improvement. The Idaho Title IV programs believe they can achieve even better performance and will strive for 2.5 percent percentage point improvement each year of this plan. Note: This corresponds to the higher  $h=0.2$  effect size approach listed above.

### Measurable Skill Gains

National data suggest Idaho Title IV programs are performing at the top of the second quartile in MSG rate. Regardless of this strong relative performance, Idaho Title IV programs are committing to significant improvement targets within this two-year update.

\*See NCHS Statistical Note on Target-Setting Methods in the Credential Attainment section above for rationale on percentage used for MSG expectations.

While Idaho Title-IV programs have historical data on MSG now available, the target setting approach for MSG mirrors the rationale contained above in Credential Attainment. With a two-percent annual percentage point gain indicated by the TSM approach, Idaho Title-IV programs expect to outpace that performance by a full percent across the next two Program Years. Note: This corresponds to the higher  $h=0.2$  effect size approach listed above.

### *7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities*

IDVR is involved in numerous strategies to increase and improve services to individuals with disabilities being served through the statewide workforce development system. The information below describes some of those initiatives, which are ongoing.

The WIOA Advisory Group has agreed that both IDVR and the Idaho Commission for the Blind and Visually Impaired (ICBVI) will serve as lead agencies in addressing the continuing education and technical assistance needs of workforce partners in best serving individuals with disabilities. Both VR programs have evaluated VR offices for physical and program accessibility, as well as participated in the One-Stop Committee's assessment of programmatic and physical accessibility of the two comprehensive One-Stop Centers in Idaho, and numerous affiliate sites across Idaho.

The Division and ICBVI each conducted a Comprehensive Statewide Needs Assessment which included surveys of core workforce partners. The Title IV programs disseminated germane results to core partners.

IDVR's Administrator is an official, voting member of Idaho's Workforce Development Council (WDC), and IDVR's Administrator currently serves as the One-Stop Chair for the WDC.

Core program partners have received an extension on a three-year Workforce Data Quality Initiative (WDQI) grant, secured by the Idaho Department of Labor, to enhance and automate data sharing across core programs. The shared data will include performance indicator data (e.g., wage information) as well as co-enrollment information across core programs, which will be useful to help facilitate cross-agency collaboration and service delivery. Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

Maximization of External Resource Utilization: IDVR in concert with other workforce partners will be discussing areas for improvement within the American Job Centers. Appropriate referral and co-enrollment are top priorities in order to reduce duplication of services and maximize the array of services people with disabilities can leverage. IDVR's continued participation in the WDQI project and current participation in the DataLabs co-enrollment project will help drive appropriate referral and seeks to indicate co-enrollment when potentially beneficial. IDVR is participating in the DataLabs co-enrollment project with representatives across all core WIOA programs.

The Division will continue to participate in cross-training activities with mandatory One-Stop partners which will include sharing program contact information, eligibility criteria, and training on program services and mission.

Appropriate referral and co-enrollment indication are intended to maximize the beneficial impact of all WIOA plan partners efforts for Idahoans with Disabilities regardless of program eligibility criteria. Proper controls developed under these projects seek to ensure non-duplication of services while maximizing justified service provision to best meet the needs of Idaho.

The WIOA Advisory Group is discussing strategies in the following areas: improving public awareness and access to the workforce system, coordinating business services across partners, serving rural and remote communities, and developing a career pathways/sector strategies approach with core program partners. The following briefly describes these strategies. More detailed information can be found in Section II(b)(1) and (2)(A)(B) of the Combined Plan.

**Improving Public Awareness and Access to the Workforce System** – The public listening sessions conducted by the Council and partners in 2019 show several gaps that allow various opportunities for system improvement. This includes actionable messaging of the services and benefits available to both job seekers and employers. Also, increasing referrals and service coordination among programs will help to improve outcomes for those in need. The VR programs will specifically:

- Work to improve program visibility including improved marketing tools for both employers and people with disabilities.
- Continue to work with one-stop partners to provide guidance on programmatic and physical accessibility to increase quality of services for people with disabilities.
- Coordinate activities with One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission for each core program.
- Comprehensive information and training will be provided to outside organizations, especially Community Rehabilitation Partners.

**Coordinating business services across partners to ensure delivery of streamlined and high-quality solutions** – As previously noted, statewide listening sessions brought to light that

employers are seeking services and information in a coordinated and targeted fashion. Based on this feedback, the system must clearly identify the services each program has to offer, develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach to better serve employers. In addition, an information portal needs to be developed to include information on services available from WIOA and non-WIOA partners. The VR programs will track business services provided/delivered by staff and report this information to IDOL monthly.

**Serving Rural and Remote Communities** - In our activities analysis, nearly every core and partner program identified service to rural and remote areas as a significant challenge. Idaho is largely a rural state, so the importance of this priority cannot be understated. Some WIOA partners have modified service delivery strategies to better reach rural and remote Idahoans and the system is interested in evaluating the success of the model and expanding it as appropriate. The VR programs will collaborate with One-Stop partners, including libraries, to establish information and referral procedures for serving individuals with disabilities in rural communities, where VR lacks a physical presence. The Idaho Commission for Libraries continues to be a valuable partner toward expanding options for workforce participants in rural communities across the state.

**Career Pathways/Sector Partnerships** - Our economic analysis revealed that many of Idaho's in-demand and high-growth occupations are in industries such as manufacturing, trades, retail and service, construction, and health care. The Council, in partnership with the State Board of Education and the state's Chamber of Commerce, is beginning to evaluate skills and certifications that are valued across industries to transform the delivery of workforce training and education. The VR programs will specifically:

- Contribute to the sector approach established by the IDOL.
- Train staff and expand utilization of the career pathways established by ICTE, including the Career Atlas tool.
- Explore the development of similar tools for pathways common to quality VR outcomes.
- Continue to focus on and train staff to use IDOL or other sources of local area LMI (e.g. Career Index Plus, CIS) to better inform customers' employment goal selection.

#### *8. How the agency's strategies will be used to:*

##### *A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;*

The Division's latest Comprehensive Statewide Needs Assessment (CSNA) process was finalized and published in April 2020. This CSNA has been used to inform our latest goals and priorities and to develop strategies to achieve the goals and priorities within IDVR's four-year work plan.

The agency's goals and priorities have been outlined in section (I): state goals and priorities. This section (o) has addressed the program specific strategies to achieve the goals and priorities and related these to the CSNA and other data sources to support these arguments. This information in concert with the initiatives laid out in the combined plan operational elements iii.a precisely addresses how the State will approach these priorities.

##### *B. Support innovation and expansion activities; and*

IDVR will continue to maintain the two ongoing primary innovation activities, supporting the activities of both the State Rehabilitation Council (SRC) and the State Independent Living Council

(SILC). The SRC serves as IDVR's advisory council and together with the Division and the CSNA inform the goals, priorities, and strategies for agency.

Additionally, the Division is targeting CRP services, Benefits Planning, and Customized Employment as Innovation and Expansion needs. These innovation activities are driven by WIOA regulatory changes and information derived from the past two CSNAs

The Division is particularly interested in designating funds for the purpose of improving the quality of CRP services to individuals with disabilities. The Division will evaluate the best approach for improvement, including input from the CRP community, and allocate resources to begin this innovative activity. It is expected that the Division will begin this process in earnest in PY2022 and continue efforts into PY2023. As of 2021 the Division has a dedicated CRP Manager position created and filled. IDVR is currently working toward an overhaul of the IDVR fee schedule and structure as a prerequisite to the formal CRP innovation project.

The expansion of Benefits Planning services to individuals who are SSI/SSDI recipients:

The Division historically has used the services provided by Montana State University, Billings, Work Incentives Planning and Assistance Program (WIPA), however, this service is only for those individuals with disabilities who are employed. The Division has prioritized the delivery of benefits counseling to customers who receive Social Security Disability benefits to promote better informed decisions regarding work, and to resolve any ambivalence/anxiety about losing benefits, as early in the VR process as possible. The Division engaged in two separate Invitations to Bid (contracts) through the Division of Purchasing to solicit vendors interested in providing this service to IDVR customers. The first bid solicitation, November 2020, resulted in sufficient bids in half of the regions across the state. The second bid solicitation, August 2021, resulted in having sufficient vendors across the entire state. The Division took the opportunity to expand Benefits Planning services in the second contract, based upon lessons learned from the first contract. Staff have been trained on the immense value of this service and referrals continue to increase. The Division actively monitors referrals and vendor performance.

The expansion of Customized Employment (CE) services through a pilot relaunch (Pilot 2.0):

IDVR engaged in an initial pilot program to launch CE services in three pilot sites across Idaho. The Division worked closely with WINTAC and our CE training provider, Griffin-Hammis Associates to train educators, CRP staff and IDVR staff including five-days of face-to-face instruction and distance and in-person technical assistance. Ultimately, the CRPs who participated in the training were unable to retain the staff trained in the pilot, and subsequently IDVR was left without the capacity to deliver CE or expand CE delivery statewide.

Staff turnover continues to be a significant issue for CRPs, and the Division is exploring potential changes to the structure of the pilot to include expanding the array of providers who are recognized as qualified CE providers as well as evaluating sustainable CE training delivery models. IDVR will continue efforts in the CE Community of Practice.

While the Division intended to develop and implement a CE Pilot 2.0, COVID response initiatives required the Division to pivot and table this initiative. The Division along with all CRP vendors have experienced significant staff and employment challenges during the past two years. CRP recruitment and retention are increasingly tenuous, and some CRP vendors have declined referrals for service provision due to their inability to hire and retain adequately trained staff.

In an effort to promote and partner with CRP vendors, the Division implemented a \$2.00 an hour CRP interim rate increase. This increase is specifically targeted to raise the salaries for frontline staff. The Division intends to stand up CRP innovation and expansion activities for traditional VR services prior to the CE 2.0 launch due to the inherent difficulty in retaining trained staff during the pilot. IDVR believes strengthening foundational services should allow a better opportunity to advance with the more complex requirements of CE.

*C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.*

The 2020 IDVR CSNA reported that the Division has improved its outreach services to unserved, underserved and minority populations.

The agency profile in o.3 shows IDVR's sustained improvement in equitable access and participation. The Division has exceeded a ratio of minority service to non-minority service ratio of 1.00 for a program year the first time under WIOA achieving a rate of 1.006 for PY 2020. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach are all potential contributors to this trend. The Division continues to improve initiatives to identify and remove barriers to access:

IDVR's Administrator has championed outreach as a priority moving into 2022. By early January 2022, all Regional Managers will have developed a regional outreach strategy specific to their areas.

Staff recommendation to improve services contained in the CSNA indicated the next focus should be on transition age youth. Sections (o)(3) and (o)(4) of IDVR's program specific strategies (contained above) further elaborate on how the Division will address equitable access and participation as it relates to this section, including coordination of outreach efforts with combined plan partners at IDOL.

*p. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS*

*Describe:*

*1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:*

*A. Identify the strategies that contributed to the achievement of the goals*

**Goal 1 - Provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential**

**Priority 1 - Expand, monitor, and improve pre-employment transition services (Pre-ETS) to students with disabilities and similar services to youth.**

The Division began collecting new baseline data for the number of students receiving Pre-ETS and has initial data in PY 2016 with the first full year of data in PY 2017 with 1180 students receiving at least one Pre-ETS activity. PY 2018 number dipped 19.7 percent to 947 students receiving at least one Pre-ETS activity however these numbers rebounded in PY 2019 to 1013 students and further increased in PY 2020 with 1209 students receiving at least one activity. IDVR requires more data to determine whether this is due to natural regression, or other yet to be determined factors.

Additionally, IDVR has experienced a division wide decrease in overall applications for all services. The Division will continue to monitor these indicators and will respond accordingly as the numbers solidify.

The Division continues to evaluate and improve services to students. The transition coordinator, along with other transition staff, developed a strategic plan in Fall 2021 with the goal of systematically advancing the Division's delivery of Pre-ETS. This latest strategic plan for Pre-ETS expansion and improvement is detailed in section 'd' of this plan.

**Priority 2- Provide a comprehensive array of services to individuals with disabilities, including individuals with Most Significant Disabilities (MSD).**

IDVR engaged in a sustained expansion of Supported Employment services, including a heightened focus on employment stability prior to the transition to long-term supports. SE expenditures per case have decreased during COVID-19 averaging \$1,661 in SE expenses per SE case per year. This is down from 2,345 in PY 2018 but still higher than the \$1218 per case baseline in PY 2016. This increase helped promote initial stability through additional hours of Job Coaching for individuals to master the essential function of the position to employer satisfaction.

The Division has hired a Community Rehabilitation Programs Manager who is currently engaged in a rate methodology evaluation for all traditional CRP services. This position will be directly involved in the Innovation and Expansion activities targeted at CRP improvement and will assist in IDVR's next Customized Employment project.

The Division has introduced stronger guidance, for staff and CRPs, on fading and appropriate reduction of support over time to ensure strategies are in place to either address current issues on the job or determine a base level of ongoing support required prior to transition to ongoing support services. These efforts are ongoing, and the Division is currently working through public comment to enhance this guidance in a new iteration of the IDVR's CRP Manual. Enhanced guidance on fading and documenting progress necessary to justify the continuation of SE services will be major components of the next manual revision.

The Division is currently structuring a second pilot to address challenges experienced in the first attempt to launch CE in Idaho. The Division anticipates a relaunch of Customized Employment 2.0 sometime in PY 2022-2023 following the CRP rate assessment project.

The Division has received intensive TA from WINTAC and is currently engaged in WINTAC's Community of Practice (CoP) on both Supported and Customized Employment.

The Division has executed its Strategic Plan to Expand Benefits Planning to Idaho's customers with MSD. Initial Benefits Planning Services were launched PY 2020 with the service achieving statewide availability in PY 2022. Benefits Planning has been identified as a priority by Idaho's State Rehabilitation Council, and IDVR's field management and this initiative realizes a long-term shared goal for the SRC and IDVR

**Priority 3 - Hire and retain qualified staff to deliver quality vocational rehabilitation services.**

IDVR has had significant challenges recruiting and retaining qualified staff over the past several years and this has been even more evident over the past year. To increase IDVR's effectiveness in

hiring and retaining qualified staff especially for the QRP positions the following strategies have been implemented or will be within the year:

- Flexibilities in work schedules
- Tuition and allowed work time for schooling requirements for staff working to achieve CSPD standard
- Paid Internship opportunities for students that meet CSPD Education credentials
- Collaborating with Division of Human Resources to demonstrate need for increased wages for State employees to be competitive
- Improved Job Announcements

Furthermore, IDVR has implemented a QRP Stabilization program, effective 11/29/2021 which implements the following recruitment/retention strategies:

1. Bonus program for newly hired QRPs effective immediately for as long as our budget permits as follows: sign-on bonus (\$2500 with second paycheck – no service commitment), recruitment bonus (\$2500 upon satisfactory completion of probation with 1 year service commitment from pay date of bonus), and retention bonus (\$2500 upon completion of 1 year of service with no documented performance issues in exchange for 1 year service commitment from payment date)
2. Retention bonuses in the amount of \$5000 for each incumbent QRP staff member in exchange for a service commitment of 2 years from the pay date of the retention bonus.
3. Increase in the hire rate for the Vocational Rehabilitation Counselor job title to \$24.04 per hour.

#### **Priority 4 - Improve usage of Labor Market Information/Career Pathways to inform customer career choice.**

IDVR continues to use the Career Index Plus and the Idaho Department of Labor tools and resources to advance this priority.

The Idaho Department of Labor is regularly invited to IDVR's Inservice to provide training on local labor markets and IDOL tools available, including accessing local labor economists, to better understand local area conditions. Training on Comprehensive Assessment incorporating local labor market data is a continued emphasis for the agency. The Division continues to evaluate career pathways tools to assist counselors and customers in promoting informed decisions on vocational goals and potential career arcs, however improvements to the career pathways initiative is still a need for the agency.

The Division included an evaluation of LMI present in Comprehensive Assessments in its 2019-2021 Case File Review Seasons and will be promoting greater utilization of local (or anticipated) labor market for the vocational goal of choice. The 2022 version of the instrument will isolate local LMI analysis as a distinct item within the assessment to better gauge the impact of training. The Combined portion of this plan outlines new tools developed in a partnership with IDOL, the Idaho STEM Action Center and the Idaho Workforce Development Council which will be a part of systemwide training to promote the utilization of live LMI dashboards.

## **Goal 2 - Improve VR program efficiency through continuous quality improvement activities**

### **Priority 1 - Meet or exceed negotiated targets on Primary Performance Indicators 1-5 established by the US Department of Education, Rehabilitation Services Administration.**

As of September 2019, Idaho's core program partners have all signed on to the State Wage Interchange System (SWIS) and will now be able to gather additional out-of-state data from other SWIS states. IDVR has met or exceeded all negotiated targets with RSA in this two-year period.

IDOL secured a Workforce Data Quality Initiative WDQI grant from US DOL with expressed support from the Division. IDVR is working with the WDQI lead and other core WIOA programs to leverage the WDQI resources to improve and automate the exchange of secure co-enrollment data and other critical shared elements of importance to the group. As a result of efforts identified in the WDQI, core programs should realize more efficient and secure data exchange of required WIOA data elements needed by multiple core partners.

IDVR now has data online for all Primary Performance Indicators 1-5 and is well positioned to use these indicators, alongside other measures to monitor performance under WIOA.

### **Priority 2 - Revise IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council to increase the response rate, retention rate, and overall satisfaction rate.**

Priority 2 has met most of the major goals outlined. The agency will continue to monitor the overall satisfaction rate for customers now that the CSS is stable and operating as intended.

### **Priority 3 - Maximize the utilization of comparable benefits.**

Preliminary attention has been given to this priority and understanding comparable benefit utilization and documentation is a current focus area for IDVR's Case File Review. Emerging data suggests a need to further information and communication activities to not only maximize the utilization of comparable benefits and services, but also to better document these benefits on the plan when they are used. The Division is not currently satisfied with our level of comparable benefit quarterly reporting and is working toward improving the utilization and accurate reporting of comparable benefits.

IDVR is working to increase appropriate referral to American Job Center Network Partners in local areas: IDVR's administrator is Idaho's Workforce Development Council One-Stop chairperson, and in this capacity has increased local area engagement between WIOA combined plan partners and other stakeholders. This is accomplished via multiple monthly in-person meetings to facilitate better understanding of programs and increase utilization of available resources and expertise. This should have an impact on volume and validity of referrals to comparable services and resources and a corresponding increase in co-enrollment between combined plan partners. The Division is also involved with the DataLabs project which seeks, in part, to identify potential co-enrollment opportunities to increase meaningful co-enrollment with other WIOA partners.

The Division has also issued recent guidance clarifying the scope of comparable benefits and included procedures for better documenting comparable benefits on the IPE.

IDVR is using RSA's data dashboards as a part of its data validation strategy. In this analysis the Division has uncovered a flaw in how these are represented in the report through the Aware case



management system. IDVR is working hand-in-hand with Aware to better understand and rectify this reporting error.

#### **Priority 4 - Increase IDVR integration with the workforce development system.**

The IDVR Administrator is the Workforce Development Council (WDC) One-Stop Committee Chair. The Committee has prioritized numerous activities since the last State Plan, including:

- Idaho's One-Stop/American Job Center structure has been formalized including: two comprehensive centers (Idaho Falls and Lewiston), and the designation of affiliate sites, and network partners.
- A cost sharing agreement between WIOA partners has been completed August 2021 and is now in effect.
- Conducting both physical and programmatic accessibility of comprehensive, affiliate, and network partner sites.
- Co-enrollment information is now being exchanged, however efforts to increase relevant co-enrollment are advancing through combined plan partner efforts including IDVR direct participation in WDQI and DataLabs co-enrollment focused projects.

#### **Priority 5 - Evaluate IDVR assessment expenditures.**

While the evaluation of assessment expenditures remains a priority for the agency, progress on this priority was minimal this PY. The Division is committed to launching and finalizing our off-season evaluation of assessment expenditures in PY 2022.

#### **Priority 6 - Revise internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle.**

Priority 6 has been met in whole and is an institutionalized cyclical activity in IDVR's continuous quality improvement strategy. This priority will be removed or substantially modified in the next state plan.

#### **Priority 7 - Collaborate with Community Rehabilitation Program partners to improve the quality of services.**

IDVR continues to improve how we communicate with and work with our Community Rehabilitation Providers (CRPs). Fundamental to these changes was the establishment of a formalized CRP Manual articulating and clarifying expectations and requirements around billing, service delivery, monitoring, pilot CRP projects, rural and underserved areas and frequently asked questions. The Division is in the middle of a revision phase and is currently collecting comment from internal field staff and CRPs to make incremental improvements to the guide and will continue to do so over time. While a new Manual was slated for release in January 2022, this update has been postponed in conjunction with the creation of a CRP Manager position to help meet this priority which was filled 11/1/2021.

Customer Satisfaction Survey results for CRP services (including assessment services) are particularly low and continue to indicate a strong need to act on this priority.

IDVR realizes a need to further enhance collaboration with CRPs to work on a variety of services from assessment, to job development and placement and to include supported and customized employment. Data from both the 2016 and 2020 CSNA strongly indicate a need to utilize

Innovation and Expansion funds to elevate the quality of CRPs in the coming state plan. This will be a primary emphasis for the Division in this plan.

### **Goal 3 - Meet the needs of Idaho businesses**

#### **Priority 1 - IDVR to be recognized by the business community as the disability experts in the workforce system.**

IDVR provides coordination of employer related outreach efforts within the Division and coordinated services under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners. IDVR continues to evolve services provided to business and has plans for continued the growth and expansion of the business relations team, additional training for IDVR staff, increase of services provided to business, as well as increasing coordinated services to business with partners.

IDVR continues to engage in coordinated business services internally through the Business Engagement Leadership Team. This team is comprised of at least one IDVR staff representative from each region, with the activities of the team directed by the Business Relations Manager. Regional Manager representation is also present within the team with two of eight Regional Managers providing support.

IDVR completed strategic planning sessions in the fall of 2020 to identify the next steps needed to further develop and increase agency performance serving business customers. The strategic planning sessions took place over four different sessions where agency business engagement activities were discussed, evaluated, and identified needs were prioritized. Following the strategic planning sessions, the feedback was synthesized into a working plan.

The goals of the working plan identified various areas of focus over the next five years including the implementation of minimum performance expectations for each IDVR job category, increasing staff competency when connecting with business/providing services, development of a communication plan for business engagement, to establish the Division as a resource to business, to develop a strategy for completing business engagement activities with outside agencies and partners, and to increase overall agency business engagement performance. Significant Division progress towards these goals has been made since the development of this business work plan.

IDVR has revised the identified job descriptions to include business engagement into the job classification descriptions. Additionally, regional Business Engagement Plans were developed and implemented including an outline of goals for business engagement. These goals include the utilization of a team approach within each region that allows staff to participate in business engagement activities in various ways based upon their individual strengths.

Staff competency across the Division has been increased through addressing training and competency at the regional level as identified in each Regional Business Engagement plan, as well as training delivered by the Business Relations Manager. Training delivered to each region by the Business Relations Manager has been identified based upon review of agency performance and review of staff needs that have been identified. Regional training has been identified and provided based upon review of the specific needs staff of that team. Additionally, a formal training outline to provide training to identified staff upon the completion of their entrance probationary period has been developed.

With the multitude of changes that have been implemented, there has been an increase in the variety and quality of services provided to businesses. Division staff are providing more support to businesses in Workforce Recruitment Assistance, Training Services, and Accessing Untapped Labor Pools than in prior years. These quality services provided to business have increased from 18% (179) of services provided to business in 2018, to 21% (148) in 2020 and to 33% (261) to date in 2021. Additionally, quality relationships with business and number of services provided to business customers are expected to continue to grow with the outlined goals related to quantity and quality of engagements with business in each Regional Business Engagement plan and through continued implementation of the Division's Business Engagement Strategic Plan.

IDVR is currently evaluating the potential expansion of the Business Relations team to improve the quality of services provided to business, with expanded capacity to provide additional services. This evaluation is for the purpose of determining the capacity required to allow the Division to meet the vision of the program and to align with the goals under WIOA to increase employer services and partnership with WIOA partners at the local level to allow for increased and effective collaboration.

IDVR will continue to coordinate business outreach efforts with the Idaho Department of Labor, and their business outreach team which serves as the central point of contact for WIOA coordinated business outreach activities. IDVR will continue to participate in the One-Stop Teams to enhance partnerships with Titles I-IV and other combined state plan partners throughout the state. The partnership for serving Idaho Business will be elevated with an enhanced partnership and collaboration for serving Idaho Businesses, through Apprenticeship, under the DOL Apprenticeship Grant.

IDVR's Business Relations Coordinator is engaged with the National Employment Team (the NET) and attends the national conference in addition to receiving regular updates, conference calls provided through a NET community of practice. IDVR also has a working group through federal Region X (WA, OR, AK, ID) where business engagement leads from each state share best practices and approaches. Additionally, the business engagement leads in Region X are working to expand joint services to businesses that have a multi-state presence to better meet the needs of Region X businesses.

*B. Describe the factors that impeded the achievement of the goals and priorities*

Factors that impeded the achievement of goals and priorities are discussed within the narrative of the preceding section (p)(1)(A) under their respective goals and priorities. Globally, the COVID-19 pandemic has had a deleterious effect on the advancement of goals and priorities listed in (p)(1)(a), particularly with innovation and expansion activities, and projects like the CE pilot 2.0. Hiring and retention continue to be issues which are exacerbated by the pandemic.

*2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:*

*A. Identify the strategies that contributed to the achievement of the goals*

IDVR is the DSU administering the Supported Employment program under 34 CFR 363 for the State of Idaho. IDVR provides supported employment services for eligible customers with the most significant disabilities.

Section L. 2 contains goals and objectives for the VR and SE programs.

The Division anticipates being able to serve approximately 181 individuals in SE plan status annually with the \$300,000 available in the SE Supplemental grant at an average cost of \$1,661, and further supplements these funds with general funds once exhausted. As noted in section K.2.B., IDVR anticipates between 459-482 customers will require SE services in a plan annually during this plan period estimating total SE expenditures between \$762k-\$800k annually.

WIOA has a financial requirement for Title VI, Part B funds. IDVR is required to set aside 50% of these supplemental funds for service provision to youth with disabilities and provide a 10% state match to these funds. The Division anticipates it will spend these funds and more in the coming year on students and youth. The Division does not anticipate any issues expending the \$150,000 set aside for SE services, and Extended Services to students and youth. The Division has and will continue to supplement Title VI, Part B funds when needed with Title I grant funds.

Supported Employment related goals include a specific strategic plan employment rate goal at 2nd and 4th quarter and intersect with several global VR program goals relating to service improvement. This section will outline current progress toward achieving SE relevant goals contained in this state plan and IDVR's Strategic Plan.

IDVR's Goal 1 Priority 2 concentrates on ensuring an array of services, including quality supported employment services, are available for individuals with Most Significant Disabilities in Idaho. Under Goal 1 Priority 2, SE Goal 1.1 and 1.2 are reported annually in IDVR strategic planning and performance evaluation process:

State Plan Goal 1 Priority 2 - Provide a comprehensive array of services to individual with disabilities, including individuals with Most Significant Disabilities (MSD).

The Division utilizes the following Primary Performance Indicators along with supplemental customer satisfaction and other data to gauge performance toward achieving SE goals and priorities.

SE Goal 1: To promote quality SE service provision through stability as demonstrated by 2nd and 4th quarter employment rates for customers who received SE services.

- Performance Measure SE 1.1: For all successful Supported Employment closures: the percentage of customers employed in the 2nd quarter after exit.
- Performance Measure SE 1.2: For all successful Supported Employment closures: the percentage of customers employed in the 4th quarter after exit.

Performance Measure SE 1.1 and 1.2:

	PY19	PY20	Benchmark
2nd Quarter SE Employment Rate	81.67%	77.77%	≥60%
4th Quarter SE Employment Rate	76.13%	67.56%	≥50%

While benchmark goals were met for IDVR's SE employment rate goals, performance regressed slightly for second quarter outcomes between PY19 and 20. Fourth quarter employment rates for SE were significantly higher, while substantially outpacing the 50 percent or greater

benchmark. Employment rates for Idaho in this period did vacillate due to initial COVID restrictions and ripple effects across the labor market but have returned to pre-pandemic levels. The Division will continue to monitor these rates for SE customers, particularly against the potential impact CRP innovation and expansion activities outlined in this state plan may have on this population.

The Division is also looking at 2<sup>nd</sup> and 4<sup>th</sup> quarter median wage over time as a potential indicator of SE quality services.

	PY19	PY20
2nd Quarter Median Wage	\$948.60	\$814.09
4th Quarter Median Wage	\$818.12	\$1,055.18

Second quarter median wage for SE fell 14 percent from PY19 to PY 20, while 4<sup>th</sup> quarter median wage increased by nearly 29 percent across the same period. The agency will continue to monitor SE 2<sup>nd</sup> and 4<sup>th</sup> quarter median wages over time to establish a better understanding of normal performance prior to deciding on whether to formalize this indicator. The Division expects to maintain or improve performance in general over this stable benchmark.

Goal 2 Priority 2 of IDVR's section of the State Plan is to continue to monitor IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council and work together on strategies to increase the overall satisfaction rate. Furthermore Goal 2 Priority 5 is to improve the overall quality of CRP services.

As a function of its consumer satisfaction survey, IDVR collects information on the satisfaction of consumers who received services from CRPs through an enhanced section of the instrument. The Division continues to explore options to improve this instrument. While the Division asks multiple satisfaction questions on CRP services, core CRP satisfaction is gauged by the following item:

Customer Satisfaction with CRP Services (Exited after Plan with CRP Service Authorizations): "I would recommend the Community Rehabilitation Provider(s) that assisted me to others in my community who need similar services."

	Strongly Agree	Agree	Disagree	Strongly Disagree
PY2019	44.94%	31.01%	16.46%	7.59%
PY2020	44.44%	30.30%	7.07%	18.18%

The Division is concerned with the increase in Strongly Disagree on CRP services from PY19-PY20 and will continue to monitor this shift but believe it may be an artifact of the pandemic.

The Division had committed to a sustained campaign to improve frontline services to individuals with disabilities offered by Idaho's Community Rehabilitation Providers in the 2020 state plan update (to include Supported Employment). Unfortunately, these efforts were placed on hold as the agency pivoted to adapt to the COVID-19 pandemic. However, the Division has reclassified an FTE, developed a new position, and hired a dedicated Community Rehabilitation Program Manager to lead these improvements, and this strategy is now under implementation.

Expansion of service delivery options remains an expressed need in more rural and remote areas of Idaho, while indicated improvements were for traditional CRP and Pre-ETS services remains an

agency priority, including a need for more relevant community-based assessment options, stronger local area collaboration between IDVR and providers, and timeliness to CRP service initiation. The Division is currently developing a live dashboard tool for CRP service availability, including live data on Supported Employment service availability and ongoing support service availability for transfer once SE customers have achieved employment stability.

The Division is committed to engaging in innovation and expansion activities designed to establish, develop and/or improve Community Rehabilitation Programs (CRPs) across Idaho. Based on sustained demonstrated need highlighted in the past two Comprehensive Statewide Needs Assessments and aligned with the joint goals of IDVR's administration and IDVR's State Rehabilitation Council the Division is currently exploring several potential initiatives (more detail on these options can be found in IDVR's Innovation and Expansion section of this state plan) to promote quality CRP outcomes including but not limited to:

- Promoting the Professionalization of CRP Staff:
- Reconciling IDVR's CRP Fee Schedule for WIOA Expectations:
- Clarifying Expectations/Information and Communication:
- Strengthen the Feedback Loop with CRPs:
- Targeted Evaluation of CRP Services for Effectiveness:

IDVR is engaged in a structured cyclical program evaluation strategy to maintain and improve the quality of services provided to customers through community rehabilitation providers statewide.

IDVR generates annual CRP employment reports for each vendor who provided services in the past fiscal year. The tool provides information to customers to enhance informed choice while they are selecting a CRP. These reports contain aggregated data gathered from our case management system. Information provided includes number of cases served, employment outcomes, average hourly wage of consumers who exit the program successfully, average hours worked per week per consumer, average annual earnings per consumer, employer sponsored benefit rate of those successful closures, the top five occupational outcome categories, and the primary impairments of those served. Counselors provide this information in a manner the consumer can understand to help promote informed choice.

The Division works closely with other state entities who fund ongoing support services beyond SE to provide extended supports where necessary, including extended services to youth that would otherwise be funded by IDVR under 34 CFR 363.22. The Division works to implement a natural supports strategy where indicated.

#### *B. Describe the factors that impeded the achievement of the goals and priorities*

The current labor market and fiscal conditions make recruitment and retention significant ongoing challenges for many of Idaho's Community Rehabilitation Programs. The Division continues to see a decline in Community Rehabilitation Programs across the state. Furthermore, in some regions, IDVR personnel are having difficulty finding CRP to provide core service delivery, even for traditional CRP services. Record sustained unemployment across Idaho has created an environment where CRP staff can often receive nominal wage increases to work entry level positions in their local labor markets. CRPs are in many cases unable to compete for these staff.

*3. The VR program's performance on the performance accountability indicators under section 116 of WIOA*

Table 1: Historical Performance of IDVR on 116 Primary Performance Indicators (actual/non-adjusted)

Primary Indicator of Performance	PY 2018	PY 2019	PY 2020	PY 2021
Employment Rate – 2 <sup>nd</sup> Quarter after Exit	53.6% (ETA9169)	59.3% (ETA9169)	58.9% (ETA9169)	
Employment Rate – 4 <sup>th</sup> Quarter after Exit	53.1% (IDVR)	54.6% (ETA9169)	57.3% (ETA9169)	
Median Earnings – 2 <sup>nd</sup> Quarter after Exit	\$3734 (ETA9169)	\$4055 (ETA9169)	\$4259 (ETA9169)	
Credential Attainment	26% (Aware data)	3.8% (ETA9169)	40.3% (ETA9169)	
Measurable Skill Gains	35.3% (ETA9169)	51.2% (ETA9169)	52.6% (ETA9169)	
Effectiveness in Serving Employers	--	--	--	--

*4. How the funds reserved for innovation and expansion (I&E) activities were utilized*

IDVR provided funding support for the State Rehabilitation Council expenditures including travel, lodging, supplies, meeting room rentals, interpreters when necessary, facilitation services. Due to COVID-19, I&E expenditures for FFY21 dropped to 12 percent of FFY19 SRC expenses as the SRC relied on distance technologies provided by IDVR.

**FFY 2020 Cost: \$7,075**

**FFY 2021 Cost: \$2,911**

IDVR funds the State Independent Living Council (SILC) for the purpose of Innovation and Expansion activities. Title I funds reserved for the SILC were used to support personnel and functions necessary for the operation of the SILC. SILC I&E expenses were also down to 70 percent of FY19 expenses.

**FFY 2020 Cost: \$99,461**

**FFY 2021 Cost: \$96,176**

*q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES*

*Include the following:*

- 1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities*

The Idaho Division of Vocational Rehabilitation (IDVR) provides the full scope of Supported Employment Services (SE) to those Vocational Rehabilitation (VR) eligible customers with the most significant disabilities, who require extended services to maintain employment. Supported employment services are available to individuals with the most significant disabilities, including youth with the most significant disabilities.

Supported Employment Services include the following:

Time limited services needed to include job coaching and communication with the employers, to support training while the individual is employed. Continued funding of SE cases is contingent upon progress toward learning the essential functions of the job and/or fading hours of ongoing support to the level of employer satisfaction immediately prior to the assessment of initial stability.

Any other service that would be identified as requisite to the targeted supported employment outcome after placement ahead of transfer to externally funded ongoing support services.

SE may also include Customized Employment elements, after placement.

Youth Extended Services (YES) are available for qualifying youth in the absence of other ongoing support services available in the community.

Each customer's IPE describes the timing of the transition into extended services, which is to be provided by the long-term support provider following the termination of time-limited services by IDVR.

Fifty percent of the Title VI-B (Supported Employment) grant will be reserved for youth with the most significant disabilities; the Division will set aside a 10% non-federal matching fund to meet the requirement of §363.23. For FFY 2022 this amount will be \$15,000 (Title VI-B Youth). The corresponding adult SE grant does not require a set aside.

Supported Employment Services are delivered by CRPs throughout the State of Idaho. IDVR's CRP quality assurance process is detailed in section (o)(5) of this plan.

## *2. The timing of transition to extended services*

WIOA extended the SE time period from 18 to 24 months. The Division has created protocols for and has made Youth Extended Services (YES) available for youth who are MSD when needed as required by WIOA. As Idaho has external funders of ongoing support services through multiple avenues, the Division does not currently have to expend YES funds.

Extended services may be provided to youth with the most significant disabilities for a period up to four years, or until the individual turns 25 and no longer meets the definition of a "youth with a disability", whichever comes first. SE services for adults shall not exceed 24 months, unless an exception is granted. Since 2004, the Extended Employment Services (EES) program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability.

### **Stability Assessment and ES Timing:**

If external sources of LTS are not available, a stability assessment must include consideration of ability to sustain employment in the absence of external LTS utilizing natural supports (NS). In cases where NS would not satisfy the needs of the employer, SE services will continue until external LTS funds become available, or customer stability is achieved under a NS strategy (up to 24 months unless exception is justified). Periodic monitoring occurs to ensure that each customer receiving SE services is making satisfactory progress, including twice-monthly requirements to document progress toward these goals.



## VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

*States must provide written and signed certifications that:*

- 1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];*

*Enter the name of designated State agency or designated State unit, as appropriate*

Idaho Division of Vocational Rehabilitation

- 2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17], the Rehabilitation Act, and all applicable regulations[18], policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;*

*Enter the name of designated State agency*

Idaho State Board of Education

- 3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19], the Rehabilitation Act, and all applicable regulations[20], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;*
- 4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;*
- 5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.*
- 6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.*

- 7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;*

*Enter the name of authorized representative below*

Jane Donnellan

- 8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;*

*Enter the title of authorized representative below*

Administrator

9. *The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.*

*Footnotes*

*[14] Public Law 113-128.*

*[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.*

*[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.*

*[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.*

*[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.*

*[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.*

*[20] Applicable regulations, in part, include the citations in footnote 6.*

**CERTIFICATION SIGNATURE**

Signatory information	Enter Signatory information in this column
Name of Signatory	[Jane Donnellan]
Title of Signatory	[Administrator]
Date Signed	[03/08/2022]

**ASSURANCES**

*The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:***

<i>The State Plan must include</i>	<b>Include</b>
<i>1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.</i>	

<i>The State Plan must include</i>	Include
<i>2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.</i>	
<i>3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:</i>	
<i>3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act</i>	
<i>3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):</i>	
<i>3.b.(A) "is an independent State commission" (Yes/No)</i>	No
<i>3.b.(B) "has established a State Rehabilitation Council" (Yes/No)</i>	Yes
<i>3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act</i>	
<i>3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)</i>	
<i>3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)</i>	No
<i>3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)</i>	No
<i>3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan</i>	Yes
<i>3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act</i>	
<i>3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act</i>	
<i>3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act</i>	
<i>3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act</i>	
<i>3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities</i>	

<i>The State Plan must include</i>	Include
<i>3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act</i>	
<i>4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:</i>	
<i>4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act</i>	
<i>4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act</i>	
<i>4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)</i>	Yes
<i>4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act</i>	
<i>4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act</i>	
<i>4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act</i>	
<i>4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act</i>	
<i>4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act</i>	
<i>4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs</i>	
<i>4.j. With respect to students with disabilities, the State,</i>	
<i>4.j.i. Has developed and will implement,</i>	
<i>4.j.i.I. Strategies to address the needs identified in the assessments; and</i>	
<i>4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and</i>	
<i>4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))</i>	
<i>5. Program Administration for the Supported Employment Title VI Supplement:</i>	
<i>5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act</i>	
<i>5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act</i>	

<i>The State Plan must include</i>	<b>Include</b>
<i>5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act</i>	
<i>6. Financial Administration of the Supported Employment Program:</i>	
<i>6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act</i>	
<i>6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act</i>	
<i>7. Provision of Supported Employment Services:</i>	<b>Yes</b>
<i>7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act</i>	
<i>7.b. The designated State agency assures that:</i>	
<i>7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act</i>	
<i>7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act</i>	

## VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

### **Performance Goals for the Core Programs**

*Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.*

*For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of*

*performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.*

*For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit);*
- *Credential Attainment Rate; and*
- *Measurable Skill Gains*

*The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

*The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.*

*For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit); and*
- *Credential Attainment Rate*

*VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.*

*The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for*

*the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.*

*Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.*

*States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.*

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	58.9%	59.5%	58.9%	60.0%
Employment (Fourth Quarter After Exit)	57.3%	57.8%	57.3%	58.3%
Median Earnings (Second Quarter After Exit)	\$4,365	\$4400	\$4,472	\$4500
Credential Attainment Rate	42.8%	42.8%	45.3%	44.0%
Measurable Skill Gains	55.1%	55.1%	57.6%	57.6%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> “Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

### ***PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (BLIND)***

*The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:[13] Sec. 102(b)(2)(D)(iii) of WIOA*

#### ***a. INPUT OF STATE REHABILITATION COUNCIL***

*All agencies, except for those that are independent consumer-controlled commissions, must describe the following:*

- 1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;*

The Idaho Commission for the Blind and Visually Impaired (ICBVI) falls under a Commission of 5 Board Members (ICBVI Board) who are appointed by the Governor of Idaho. The ICBVI Board holds four meetings a year that are open to the public and a designated consumer input time is always on

the agenda. The ICBVI Board reviews and approves all policy regarding the Vocational Rehabilitation Program at ICBVI. Any recommendations by the ICBVI Board are discussed at the public meetings.

*2. The designated State unit's response to the Council's input and recommendations; and*

Does not apply (see a(1))

*3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.*

Does not apply (see a.(1)).

#### *b. REQUEST FOR WAIVER OF STATEWIDENESS*

*When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:*

*1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;*

Services provided under the State Plan are available in all political subdivisions of the state.

*2. The designated State unit will approve each proposed service before it is put into effect; and*

The state unit may provide services in one or more political subdivisions of the state that increase services or expand the scope of services that are available statewide under this State Plan if the:

a. non-federal share of the cost of these services is met from funds provided by a local public agency, including funds contributed to a local public agency by a private agency, organization or individual;

b. services are likely to promote the vocational rehabilitation of substantially larger numbers of individuals with disabilities or of individuals with disabilities with particular types of impairments; and

c. state, for purposes other than the establishment of a community rehabilitation program or the construction of a particular facility for community rehabilitation program purposes, requests in attachment 4.7(b)(3) a waiver of the state wideness requirement in accordance with the following requirements:

- identification of the types of services to be provided;
- written assurance from the local public agency that it will make available to the state unit the nonfederal share of funds;
- written assurance that state unit approval will be obtained for each proposed service before it is put into effect; and
- written assurance that all other State Plan requirements, including a state's order of selection, will apply to all services approved under the waiver.

*3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.*



Contributions, consistent with the requirements of 34 CFR 361.60(b)(3)(ii), by private entities of earmarked funds for particular geographic areas within the state may be used as part of the nonfederal share without the state requesting a waiver of the state wide ness requirement provided that the state notifies the commissioner that it cannot provide the full nonfederal share without using the earmarked funds.

*c. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE  
STATEWIDE WORKFORCE DEVELOPMENT SYSTEM*

*Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:*

*1. Federal, State, and local agencies and programs;*

ICBVI has the following cooperative agreements:

**Idaho Educational Services for the Deaf and Blind (IESDB):** This agreement outlines how the two agencies will coordinate referrals, data sharing, services and communication to benefit the transition of students with blindness and visual impairments throughout the state.

**Idaho Division of Vocational Rehabilitation (IDVR):** This Memorandum of Understanding (MOU) establishes guidelines and policies to delineate the services both agencies will provide to individuals with disabilities. Furthermore, this agreement enhances cooperation and collaboration between the two agencies, improves inter-agency communication, and establishes staff cross-training opportunities.

**Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe):** ICBVI, along with IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities.

**State Department of Education (SDE):** ICBVI, along with IDVR and the Idaho SDE established and approved a Memorandum of Understanding for Transition Services for Students with Disabilities, which includes the provision of Pre- Employment Transition Services, and clarifies the roles and responsibilities of each agency.

*2. State programs carried out under section 4 of the Assistive Technology Act of 1998;*

ICBVI provides assistive technology services to participants in the state via regional Instructors of the Blind (Rehab Teachers). As part of the Comprehensive Assessment, all eligible individuals are given an assessment by the Rehab teachers to assess their assistive technology needs and levels of training that they may require. The Commissions statewide Assistive Technologist provides training and support for the regional Rehab Teachers, as well as conducting assessments when he travels to the regional offices.

*3. Programs carried out by the Under Secretary for Rural Development of the Department of  
Agriculture;*

ICBVI does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

#### *4. Non-educational agencies serving out-of-school youth; and*

While ICBVI does not engage in any cooperative agreements with any noneducational agencies who serve out of school youth, the Commission does collaborate with all WIOA Core partners to identify and engage those out of school youth in the state who are blind or visually impaired.

Out-of-school youth are encouraged to complete their high school education or pursue a formal GED program whenever possible to increase their options and access to postsecondary opportunities. This includes referral to Idaho Career & Technical Education's Adult Education program. Idaho Job Corps now maintains a partnership with Idaho Universities to offer a path to a high school diploma or GED for those age 16-24.

ICBVI also connects appropriate youth to The Youth Apprenticeship Program. This program connects people, ages 16-24, to training and careers in Idaho. The Youth Apprenticeship program provides education, work experience, and access to postsecondary education, training, and certifications.

ICBVI also partners with Job Corps to develop ways to provide students with access to paid work experiences, work readiness training, and instruction in self-advocacy in addition to attending their Job Corps courses. Job Corps is now housed in regional Universities, which makes the program and other educational opportunities much more accessible for individuals serviced by the Commission. ICBVI had one individual who participated in the Job Corps program in the past two years, and is now doing her internship with a regional employer in her chosen career goal.

The Commission will be collaborating with the Idaho Department of Labor for the purpose of expanding apprenticeships in the state. The apprenticeship program in the state is a priority of the Idaho Workforce Development Council, and therefore receives strong support across the state.

ICBVI also partners with Forging Futures to serve both in school and out of school youth. Created by the Idaho Manufacturing Alliance, Forging Futures Idaho is a workforce-pipeline initiative that focuses on creating and promoting manufacturing career opportunities for Idahoans through purposeful education and connections with industry partners, resources, and community support.

#### *5. State use contracting programs.*

ICBVI does not engage in any state use contracting programs.

#### *d. COORDINATION WITH EDUCATION OFFICIALS*

*Describe:*

- 1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students*

In collaboration with the Transition Coordinator, ICBVI VR Counselors and the Idaho Education Services for the Deaf and Blind (IESDB) staff coordinate with regional education officials to identify blind and visually impaired students in the K-12 school system. VR counselors regularly meet with

the special education teachers, teachers of the visually impaired (IESDB Staff), school counselors, school nurses and other personnel involved in school to work transition. A transition Individualized Plan for Employment (IPE) is developed within 90 days of eligibility determination (unless an extension is agreed upon) to assist the student with their successful transition from school to work.

To facilitate the transition of students with the disabilities, the following cooperative agreements have been established:

Idaho State Department of Education - July 2018

Idaho Educational Services for the Deaf and Blind - November 2021

Pre-Employment Transition Services (Pre-ETS): In collaboration with local educational agencies (LEA's), IESDB, and IDVR are required to offer to transition age students with disabilities (ages 14-21), Pre-Employment Transition Services (CFR 361.48(a)).

Pre-ETS are available to students with disabilities who are potentially eligible and eligible for ICBVI VR services.

In 2020, ICBVI and IDVR administration agreed to a minimum age of 14 years old that students with disabilities may begin receiving Pre-Employment Transition Services. This agreed lower threshold will be effective upon approval of this plan.

Pre-ETS include:

- Job exploration counseling;
- Work-based learning experiences, (which may include in-school or after school opportunities, experience outside the traditional school setting including internships that are provided in an integrated environment);
- Counseling on opportunities in comprehensive transition or enrollment in post-secondary educational programs;
- Workplace readiness training to develop social skills; and
- Independent living instruction in self-advocacy/peer mentoring.

In order to reach those goals, each ICBVI region is ensuring they have a strong relationship with the local school districts, Transition Councils, and One-Stop partners. State-wide Pre-Employment Transition Services and programs have been implemented and will continue to expand as the population of high school students we serve increases.

ICBVI's Project Coordinator for Transition Services is working with all state-wide LEA's to educate and inform them of Pre-ETS activities. This individual is also communicating with all staff engaged in the delivery of Pre-ETS to help develop and enhance existing referral and outreach strategies within schools.

### **Youth seeking subminimum wage employment**

ICBVI has created a checklist for youth seeking subminimum wage employment, which includes the documentation requirements and responsibilities under Section 511. The checklist includes the requirement for a transition or Pre-ETS service to be completed prior to youth verification of Career Counseling and Information and Referral (CCI&R) under Section 511.

Under a memorandum of understanding, the Idaho Division of Vocational Rehabilitation provides CCI&R services for the state.

*Responsibilities of the VR program:*

The ICBVI checklist includes:

- Documentation of the provision of transition services or pre-employment transition services;
- Application for VR services;
- The provision of Career Counseling, and Information and Referral Services.

*Responsibilities of the Local Education Agency (LEA):*

Documentation of completion of appropriate transition services for a youth with a disability under IDEA, which includes:

- Youth's name
- Description of the service or activity completed
- Name of the provider of the required service or activity
- Date required service or activity completed

*Career Counseling, and Information and Referral Services (CCI&R)*

Counselors providing the service address the following elements of the VR process which includes a discussion of competitive integrated employment and services available at VR to assist the individual in making an informed choice whether or not to continue pursuit of employment with a 14(c) certificate holder.

CCI&R activities include:

- Counseling in self-advocacy, self-determination and high expectations
- Review of any assessment information available (e.g. Interest inventories)
- Person-centered planning
- Discussion of marketable skill
- Soft skills
- Review of labor market information
- SSA benefits planning

*2. Information on the formal interagency agreement with the State educational agency with respect to:*

*A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;*

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to promote communication and the sharing of technical expertise in transition planning. The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment. The agencies agree that:

- They will encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
- ICBVI and IDVR counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
- ICBVI and IDVR counselors are available to consult with educators concerning preemployment transition and vocational rehabilitation services for students to assist them toward employment.
- ICBVI and IDVR counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- ICBVI and/or IDVR counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The ICBVI and/or IDVR counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- ICBVI and IDVR counselors will consult with educators concerning referral of students to ICBVI and/or IDVR for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI.
- Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
- ICBVI and IDVR counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. ICBVI continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of youth with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing ICBVI's mission at the state and local level.

*B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;*

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to facilitate the development and implementation of Individualized Education Programs (IEP). The agencies agree to cooperate in the development of transitioning students' IEP and any relevant Individual Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

#### Idaho Interagency Council on Secondary Transition:

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. IDVR continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of students with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing ICBVI's mission at the state and local level. Members include the Idaho State Department of Education, Idaho Division of Vocational Rehabilitation, Idaho Commission for the Blind and Visually Impaired, Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project (administered by the University of Idaho), Idaho Health and Welfare, Juvenile Corrections, Department of Correction, and LEAs.

#### *C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;*

Idaho State Department of Education (SDE) - Secondary Transition: Idaho Commission for Blind and Visually Impaired (ICBVI), Idaho Division of Vocational Rehabilitation (IDVR), and the State Department of Education (SDE) currently have a formal cooperative agreement. This agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

- Roles and responsibilities of each agency
- Financial responsibilities of each agency, including the purchase of Assistive Technology
- Outreach and technical assistance
- Transition planning
- Referral process for students with disabilities to the appropriate VR program
- Data release and data sharing

- Planning to include timeframes for development of the IPE
- Service delivery
- Dispute resolution
- Coordination and documentation requirements under section 511
- Prohibition on entering into an arrangement with an entity holding a 14(c)-special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.

The current agreement establishes the following roles and responsibilities for the involved parties.

The Idaho State Department of Education (SDE) agrees:

- To assume the role of lead agency in facilitating interagency planning with LEAs and implementation of educational programs and transitional services for youth with disabilities in transition from high school to post-high school services.
- To support LEAs in their efforts to write IEPs using an outcome-oriented focus and to coordinate transition activities for each eligible student, beginning no later than the IEP before the student turns age 16 years (earlier if appropriate), and to address future student needs in the areas of employment, post-secondary education, vocational training; and adult living and community participation, including assistive technology.
- To invite ICBVI and /or IDVR to provide information regarding their services, including their role as an IEP team member, to school district personnel, students and their families.
- To invite ICBVI and /or IDVR counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred of ICBVI and/or IDVR for rehabilitation services.
- To work with ICBVI and IDVR Vocational Rehabilitation (VR) counselors to identify a process for such counselors to provide input and participate in the development of a student's IEP, including pre-employment transition services, when appropriate.
- To identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan (Rehabilitation Act of 1973), or students with disabilities (e.g., physical, medical, or visual, etc.) who are not eligible for special education services, to IDVR and/or ICBVI for pre-employment transition services and/or vocational rehabilitation services.

Idaho Commission for the Blind and Visually Impaired (ICBVI), and the Idaho Division of Vocational Rehabilitation (IDVR) agree:

- To encourage staff to work closely with school district personnel to ensure coordination between education services and vocational rehabilitation services.
- That ICBVI and IDVR counselors will provide training to school district personnel, students and families on all aspects of vocational rehabilitation services, including their roles as IEP team members.

- That ICBVI and IDVR counselors are available to consult with educators concerning vocational rehabilitation services for transitioning students to assist them toward employment.
- That ICBVI and IDVR counselors will collaborate with the school districts in their service areas to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- That ICBVI and IDVR counselors will consult with educators concerning referral of students to ICBVI and/or IDVR for rehabilitation services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI providing rehabilitation services
- That ICBVI and IDVR counselors will accept referrals, when it is appropriate based on the individual needs of the student, to determine eligibility and will work collaboratively, with input from the student's IEP team, to develop IPEs. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that move the student to their employment goal.
- That ICBVI and/or IDVR counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. The ICBVI and/or IDVR counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- All state plan requirements, including a state's order of selection, will apply to all services provided under this cooperative agreement.

The Idaho Commission for the Blind and Visually Impaired (ICBVI) agrees:

- To continue serving school districts across the state. All Idaho school districts are served through each regional office. ICBVI does not maintain any cooperative agreements with school districts specific to the funding of school to work transition counselors.

*D. Procedures for outreach to and identification of students with disabilities who need transition services.*

ICBVI, IDVR, and the State Department of Education (SDE) currently have a formal cooperative agreement.

The agreement stipulates that ICBVI will initiate outreach and work with the LEAs to identify potential students with disabilities who need pre-employment transition services and VR transition services for students aged 14-21. This involves informing the student, or when appropriate their parent or legal guardian, as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures, and the scope of available VR services, to include pre-employment transition services.

The Commission also engaged key stakeholders in the state through the following activities:

- Collaboration at regional special educator meetings.
- Presenting at statewide administrator meetings.



- Presenting at the Tools for Life Conference to parents, students, and educators.
- Outreach to Idaho Parents Unlimited.
- Participation in the Idaho Interagency Council on Secondary Transition.
- Ongoing collaboration with the Idaho State Department of Education.
- Ongoing collaboration with the Idaho Educational Services for the Deaf and Blind.

Outreach strategies to identify students who need transition services include:

- Counselors and Rehabilitation Teachers are assigned to the school districts in their regions. Staff participate in district transition councils, meetings, and trainings.
- The ICBVI Transition Coordinator participates in district In-Service trainings across the state.
- The MOU with IESDB emphasizes regional collaboration, data sharing, and identifying secondary school students in Idaho who are blind or visually impaired.

The Commission currently working on developing specific goals to improve outreach, which include:

- Creating training and materials that will increase students' understanding about the VR process and services.
- Create opportunities and materials to use with families to increase their understanding VR Services.
- Increasing outreach activities to rural communities in Idaho.

Since the implementation of WIOA in 2016, most students are still currently being served in the VR program. While the relationship between outreach strategies and employment outcomes is unknown at this time, ICBVI does recognize the need for program evaluation methodologies that include measures such as these.

#### *e. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS*

*Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.*

ICBVI does not have cooperative agreements with private nonprofit service providers as we pay fee for service.

ICBVI has a Policy and Service Provision Agreement with several Community Rehabilitation Providers (CRP) that is updated as requested by either party. This agreement includes:

- Policies regarding the ICBVI authorization process and invoicing
- Staffing of referrals
- Dispute resolution
- Billable services
- Requirements for employment verification
- Policies around the provision of Pre-Employment Transition Services

This agreement also includes the provision of services, which include:

- All five of the required Pre-Employment Transition Services
- In-house vocational evaluations

- Community-based work evaluations
- Job search assistance
- Job readiness training
- On the job supports - short term
- On the job supports - supported employment

*f. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES*

*Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.*

In 2018, ICBVI relinquished all of its Title VI, Part B funds to the Idaho Division of Vocational Rehabilitation (IDVR). As a result, IDVR now manages the supported employment (SE) program for the state.

ICBVI and IDVR agree to the following:

- ICBVI and IDVR agree to collaborate on all supported employment (SE) cases when the individual has a disability profile which includes blindness or visual impairment meeting the eligibility criteria of ICBVI.
- ICBVI agrees to fund services related to addressing the visual disability.
- IDVR agrees to fund employment related services.

Furthermore, ICBVI has adopted IDVR's policies around SE, which include service provider standards.

The VR program policy around the arrangement of supported employment services and extended employment services includes:

Supported employment means competitive integrated employment (CIE), including customized employment (CE), or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward competitive integrated employment that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant disabilities. SE can be provided by the state VR programs for a period of time not to exceed 24 months, unless the VRC and client jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE refers to support services (such as job coaching) provided after placement and before the individual reaches initial stability, and prior to utilization of extended services (long-term supports).

Extended Services (ES) are those services, including extended services for youth, are provided after the assessment of initial stabilization when required for an individual to maintain employment (to sustain employment stability).

Extended Services for Youth: The state VR program makes extended services for youth available when youth have no comparable ES resources available in the community. Extended services can continue to be provided until:

- Comparable benefits become available (External funders are identified) OR
- Extended services are provided for four years OR The individual reaches the age of 25 and no longer qualifies under the definition of 'youth'.

Supported Employment services are only offered by qualified providers as identified under IDVR standards.

ICBVI is committed to the advancement of opportunities for Idaho citizens with disabilities, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. ICBVI and IDVR have established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program. This program is funded through State appropriations only. The primary service providers for long term supports under the three main funding sources are CRPs.

ICBVI and IDVR utilize the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The VR program will continue to work closely with each agency overseeing these resources to streamline the referral process and improve utilization of this external source of extended services funding. The following provides more detail on the working relationship between each ES entity and IDVR.

The Supported Employment Agency Recommendation must be completed, and this is done by IDVR on behalf of both state VR agencies when transitioning from vocational rehabilitation services or by the Supported Employment Agency (Community Rehabilitation Provider) identified on the plan or addendum. Documentation must include:

- Amount of Service
- Level of Support Needed
- Employment Goals
- Transition Plan

The ICBVI counselor is a member of the Person-Centered Planning Team and participates in all planning and coordination activities.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider. These providers are approved by the EES program administrator on a case by case basis. All EES approved providers are also CRPs which are initially approved as CRPs under IDVR's accreditation requirement.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, IDVR will utilize VR funds for the required timeframes or until the funding becomes available for the long-term support.

Extended services for youth can be provided up to four years as needed for youth under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, IDVR will continue to support extended services with Title I funds, as required by WIOA, and will continue to leverage other sources of extended services.

ICBVI and IDVR support the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE customers. Natural Supports are supports and services typically available to other employees OR supports created to provide supports through people or other resources typically available in the work, home, and community environment.

ICBVI works collaboratively with IDVR through the entire life of the SE case, and will continue to provide any supportive services needed to address the visual disability of the participant up to program exit.

#### *g. COORDINATION WITH EMPLOYERS*

*Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:*

##### *1. VR Services; and*

Through coordinated engagement, ICBVI and its workforce development partners will contribute to a more prosperous Idaho, providing businesses with talented job seekers to fill skill gaps and Idahoans living with blindness or visual impairments with the rehabilitation, training, and employment services needed to thrive in Idaho workplaces and communities. Employers may request an Assistive Technology (AT) assessment in order to hire a person with a visual impairment or who is blind. ICBVI will provide this service at no expense to the employer. This assessment may include website and network software accessibility as well as job site accommodations. ICBVI has an AT Technologist that assists all of the VR counselors in life skills assessments job site accommodations. Additionally, in 2019, ICBVI appointed the Statewide AT Technologist to coordinate business engagement activities in the state. ICBVI will work collaborative with the Idaho Department of Labor and the IDVR Business Engagement Team in achieving WIOA business outreach activities.

In early 2020, ICBVI staff attended an IDVR sponsored strategic planning session with their Business Engagement Team (BET). The outcome of this training was to initiate a collaborative approach to business engagement activities for both state VR programs.

In December of 2021, the Commission entered an Intensive Technical Assistance (ITA) agreement with the Vocational Rehabilitation Technical Assistance Center for Quality Employment (VRTAC-QE). This project will begin in February 2022 and conclude June 1, 2022. ICBVI counselors, counselor assistants, and Rehabilitation Teachers will all be participating in this training. In addition, 2 CRP's and representatives from IDVR will also participate.

ICBVI will continue to work with employers to provide general and customized technical assistance and support services to businesses and industries including input from employers in the 2020 Comprehensive State-wide Needs Assessment (CSNA):

- Through collaboration with employers to increase internship, mentoring, and training opportunities for ICBVI participants;
- By providing training in blindness and visual impairments to employers;
- By increasing visibility to employers in Idaho through marketing and outreach to businesses; and
- Through collaboration with One-Stop partners in the coordination of services to businesses (emphasis on collaboration with IDVR).

ICBVI will also focus on areas of need identified in the 2020 CSNA in respect to recommendations on how to improve business partnerships to engage employers in recruiting and hiring individuals who are blind or low vision:

- Greater community awareness and education of individuals who are blind or visually impaired, especially in rural communities;
- Increase visibility and engagement in rural communities;
- Provide quality training and job placement services; and
- Provide outreach and education to communities and employers on ICBVI services.

*2. Transition services, including pre-employment transition services, for students and youth with disabilities.*

COVID-19 presented many challenges to the provision of Pre-ETS. For the past two years, residential summer programs have been cancelled and replaced with remote learning opportunities for student. Examples of curriculum include:

- Career exploration activities
- Informational interviews
- Toastmasters
- Resume building
- Career cluster activities
- Developing interview skills
- Virtual college tours
- National keynote speakers

In addition to regional activities that are put on throughout the year, ICBVI host three main summer programs:

Work Readiness Camp – This one-week program is a collaborative effort between ICBVI, IESDB, and IDOL. This program focuses on job readiness skills, and helps to prepare students for summer employment experiences, or participation in our SWEP program.

College Days – This one-week program is for students who plan to pursue higher education after high school. This program is a collaborative effort between ICBVI, IDOL, and Boise State University.

Summer Work Experience Program - Every summer, ICBVI hosts transition aged students with disabilities (SWD) for a 7-week Summer Work Experience Program (SWEP) in Boise.

Students eligible for Pre-ETS from across the state participate in the SWEP program.

Throughout the program, all of the five required Pre-Employment Transition Services, as identified under WIOA, are delivered. ICBVI staff work with community employers to host our students for a work experience program. Students are paired with employers based upon interest and ability.

In addition, ICBVI's Project Coordinator for Transition Services, in collaboration with regional staff, will develop and implement Pre-ETS activities and programs in every region of the state.

In 2018, ICBVI launched an innovation program entitled the Visually Impaired Students Transitioning in to Adulthood (VISTA) Leadership Program. This program is specifically for transition aged students who are eligible for Pre-Employment Transition Services (Pre-ETS). This program was put on hold during the pandemic but is scheduled to resume summer of 2022.

The definition of leadership, for the purposes of this program, is more contemporary from a theoretical perspective, with a student-informed emphasis to program design. This contemporary, strength-based approach; which leverages the student's contextual resources (e.g., healthy relationships, engagement and access to community) is consistent with the theories of positive youth development.

There are 3 elements that make up the foundation of the VISTA Leadership Program:

- Social Emotional Learning
- Service Learning
- Mentoring (both peer and adult)

The formal program is one-year in length, and graduates of the VISTA Leadership Program mentor and support the incoming cohort and will continue to be supported up to their 22<sup>nd</sup> birthday, or in the event they are no longer eligible for Pre-ETS.

#### *h. INTERAGENCY COOPERATION*

*Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:*

*1. The State Medicaid plan under title XIX of the Social Security Act;*

The Idaho Department of Health and Welfare (H&W) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid H&W operates the Idaho Home and Community Based Services project.

Since IDVR manages the SE program for both state units, they oversee the development of policies and procedures for the program.

IDVR has collaboratively developed a draft agreement with H&W as it relates to Title XIX of the Social Security Act.

ICBVI participates in H&W sponsored trainings to support the VR staff on Medicaid services and benefits. This training enables VR staff to assist clients and families identify how those services can support success in an employment outcome.

*2. The State agency responsible for providing services for individuals with developmental disabilities; and*

ICBVI has a partnership with the Adult Developmental Disabilities Services (ADDS) program under the Department of Health & Welfare (H&W). While there currently is no formal agreement; H&W is

a WIOA core partner. ICBVI works closely with IDVR (who manages the SE program for the state) in the provision of VR services to individuals with developmental disabilities. ICBVI have also had trainings to educate VR staff on Medicaid services and benefits thus allowing ICBVI staff to better assist clients in achieving their employment goals.

Over the past two years, ICBVI (along with IDVR) participated with a Health and Welfare driven “Community Now” engagement model with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. ICBVI has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes.

The Commission has also strengthened our collaboration with the Idaho Educational School for the Deaf and Blind, and now serve an increasing number of students with developmental disabilities. These individuals are served by both the general and blind programs, resulting in a more robust model of service delivery for these individuals with the most significant disabilities.

### *3. The State agency responsible for providing mental health services.*

Under a memorandum of understanding, ICBVI and IDVR agree to collaborate on all cases in who meet ICBVI eligibility criteria and who also have secondary severe and persistent mental health diagnosis.

This team approach is used to ensure that the Idahoans served by this agreement will benefit as to remaining de-institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those client's who have a severe and persistent mental illness deemed not eligible for the H&W-Behavioral Health program will be provided necessary VR services through ICBVI and IDVR.

ICBVI leverages the relationship with IDVR in the provision of services to individuals who are blind and visually impaired and who have significant mental health challenges. In the past two years, IDVR has represented the Title IV programs on the State Planning Council on Behavioral Health. The purpose of this Council is to “serve as an advocate for adults with serious mental issues, children with severe emotional disturbances, and others with mental health or substance use needs. Expand, improve, notify or transform Behavioral Health service delivery system for individuals with severe mental illness, serious emotional disturbance, and substance use disorders to ensure access to treatment, prevention, and rehabilitation services, including those services that go beyond the traditional behavioral health system.

The partnership has resulted in program participants experiencing more rapid engagement in the program, a broader scope of wrap around services, and leading to more opportunities for competitive integrated employment.

#### *i. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT*

*Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:*

## *1. System on Personnel and Personnel Development*

### *A. Qualified Personnel Needs*

*Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:*

- i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;*

In PY 2020, 333 participants were served in the VR program through 38 ICBVI staff. Personnel categories are broken down in the next section (ii).

In PY 2021, the following number of participants were served by the 38 ICBVI staff, broken down by quarter:

- Q1 - 333 participants
- Q2 - 342 participants
- Q3 - 369 participants

- ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and*

ICBVI currently employs a total of 38 staff necessary to provide VR services. The breakdown of personnel is as follows:

Professional Staff:

- 1 Administrator
- 1 Rehabilitation Services Chief
- 4 Program Managers
- 6 Senior VR Counselors for the Blind\*
- 14 Instructors for the Blind (includes the State Wide Assistive Technologist / Business Services Coordinator)
- 1 Project Coordinator for Transition Services.

Administrative staff:

- 1 IT Technology Senior
- 2 Fiscal Technician
- 5 Vocational Rehabilitation Assistants
- 1 Management Assistant
- 1 BEP specialist
- 1 Receptionist



\* Requirements for Senior VR Counselor for the Blind are consistent with the national standard of CRC. Individuals who do not meet those standards are designated Counselor for the Blind. All counselors currently employed at ICBVI are designated Senior Counselor of the Blind.

*iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.*

ICBVI anticipates its current number of staff (38) will be required to provide VR services, based upon projections.

Additionally, ICBVI projects 4 staff retiring in the next 5 years:

Professional- Rehabilitation Services Chief (1), Vocational Rehabilitation Counselor (2),

Administrative - Financial Technician (1).

### *B. Personnel Development*

*Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:*

*i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;*

Idaho State University was approved by the Idaho SBOE in November 2019 to begin a new Masters of Counseling specialty program: Clinical Rehabilitation Counseling. This program began fall of 2020 and is offered in two Idaho locations (Meridian and Pocatello). The program has the ability serve 24 full-time students.

*ii. The number of students enrolled at each of those institutions, broken down by type of program; and*

The University of Idaho is expecting 19 graduates in 2020 and no further students will graduate as the program is ending.

*iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.*

The Idaho State University Program has not graduated any students in their first cohort yet.

### *2. Plan for Recruitment, Preparation and Retention of Qualified Personnel*

*Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.*

ICBVI plans for recruitment will be to continue to recruit qualified staff from the Idaho State University and at other regional and national institutions of higher education. We maintain contact

with Western Washington University, Utah State University, Portland State University, Western Oregon University, University of Wisconsin-Stout, University of Northern Colorado and Montana State University, all of which have Master's programs in Rehabilitation Counseling.

ICBVI also uses the following for recruitment of Senior VR Counselors and Senior Instructors for the Blind:

- Commission on Rehabilitation Counselor Certification (CRCC)
- The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER) website
- The internet as utilized by the Idaho Division of Human Resources
- Internships and practicums completed by students with ICBVI
- Personal contact with instructors in university programs
- National Federation of the Blind (NFB) website
- CSAVR and NCSAB
- Region X Coalition

ICBVI has provided practicums and internships for Master's level students in the Rehabilitation Counseling program over the last five years and anticipates that it will provide an additional one to three practicums or internships in the next two years.

Training and continuing education is provided to VR staff from a variety of venues:

- National Rehabilitation Association (state and national conferences)
- The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER)
- Helen Keller National Institute
- State and regional conferences and workshops
- Collaborative trainings with IDVR
- Technical Assistance Centers (e.g. WITAC, YTAC)
- Annual in-service training
- Webinar based trainings

Presently, we employ 17 individuals with a disability, 12 of whom are blind or visually impaired and 2 individuals are from a minority background.

ICBVI participates in Career Fairs around the state to encourage and seek out individuals from diverse backgrounds including individuals with disabilities and from minority backgrounds.

ICBVI salaries compare favorably with the surrounding states in the Pacific Northwest. The agency also encourages and supports, costs, training/education time of staff and formal education and certification for staff.

ICBVI hires any person into a permanent position from a temporary position if they have met the minimum standards for that position as determined by the State of Idaho's Department of Human Resources for that classified position.

### *3. Personnel Standards*

*Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:*

*A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and*

Standards that are consistent with any national or State-approved or — recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services;

The State of Idaho does not require a state licensure for rehabilitation counselors. Educational standards for personnel established by ICBVI for qualified rehabilitation professionals (QRP) are intended to meet a base level of quality expected of the counselors by the Commission.

ICBVI's minimum standards for Senior VR Counselor for the Blind are consistent with the national standard of CRC. ICBVI places great importance on recruiting, hiring and retraining staff that are appropriately and adequately trained to provide services to our blind and visually impaired clients. We currently have eight staff with CRC certification, including the Chief of Rehabilitation Services. In addition, we have 14 Instructors for the Blind and six of them have Master's degrees and/or AER Certification in Rehabilitation Teaching or Orientation and Mobility.

ICBVI tracks and monitors each employee's individual training and development. Special emphasis is placed on training required to maintain CRC or AER certification. This includes training on disability topics, vocational counseling, ethics, case management, assessment, job placement strategies and especially assistive technology for the blind and visually impaired. Specific development needs identified for each employee are addressed during annual performance evaluations. While specific priorities evolve year-to-year, ICBVI consistently addresses WIOA, data collection and reporting, assessment, counseling and guidance, vocational planning, job placement, as well as assistive and rehabilitation technology.

*B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.*

ICBVI is committed to providing all employees with development opportunities which will enhance employee job performance; support the agency's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities. With emphasis on workforce development, ICBVI will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs.

Through an increased emphasis on data-driven decisions, ICBVI will increase utilization of the most recently available labor market information to promote more informed decision making on the part of client's when selecting potential employment options.

In order for staff to have a 21<sup>st</sup> century understanding of the evolving labor force and needs of individuals with disabilities, ICBVI is committed to providing training and support in the following:

- Idaho Labor Market Information
- The Career Index Plus
- Career Pathways

#### 4. Staff Development

*Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:*

*A. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and*

Specific areas of training that are emphasized are:

- The Rehabilitation Act and its regulations, as amended by WIOA;
- The Workforce Innovation and Opportunity Act (WIOA)
- Social Security Work Incentives and Employment;
- Transition planning for students with blindness and visual impairment;
- Continuing education on the medical aspects of vision related disabilities; and
- Assistive Technology for the blind and visually impaired.

All agency personnel have an annual evaluation of his or her performance, goals and plans. It is during this process that ICBVI assesses how training has impacted an employee's ability to perform the essential functions of his or her position, and to set new goals and priorities for the next year.

*B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.*

Succession planning and leadership development are discussed and emphasized to assist staff to enhance current skills or to build their skills for future opportunities for advancement within the agency. ICBVI has a policy to promote from within, which gives opportunities for current employees to advance and remain with the agency.

ICBVI continues to look for opportunities to collaborate on training and staff development with the Department of Education and the schools. ICBVI coordinates its CSPD activities with those provided under IDEA. ICBVI currently participates in:

- The Idaho Interagency Council on Secondary Transition;
- The Transition Institute;
- Tools for Life Conference;
- Independent Living Conference;
- Training and conferences provided by the Association for the Education and Rehabilitation for the Blind and Visually Impaired (AER); and
- Collaborative training with the Idaho Educational Services for the Deaf and Blind.

ICBVI will continue to work closely with the Idaho Educational Services for the Deaf and Blind addressing the needs of the transition population of the blind or visually impaired.

Throughout the year, training requests are approved for individual and group training in areas of interest or need. A variety of platforms are utilized for dissemination, including face-to-face training, conferences, and online webinars.

#### *5. Personnel to Address Individual Communication Needs*

*Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.*

ICBVI employees that are fluent in Spanish are recruited to serve the needs of the Hispanic communities located throughout the state.

ICBVI has chosen to purchase sign language interpreting services for individuals who are deaf. In cases where the client is deaf and blind, ICBVI will often work collaboratively with the general VR agency and the Helen Keller's national and regional centers to provide services. If ICBVI has a client who is monolingual speaking an interpreter will be hired by the agency.

*6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act*  
*As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.*

ICBVI VR counselors, under the direction and supervision of the Rehabilitation Services Chief, will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

The Transition Coordinator will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

Training and education will be identified for staff regarding service provision, coordination, and best practices in serving students with disabilities. The Transition Coordinator is assigned as an active member of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Training opportunities offered by ICBVI which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, every fall, ICBVI in collaboration with IDVR, IESDB and the State Department of Education host a conference (Transition Institute). This conference is attended by educators, VR staff, and other agencies and individuals who service transition age youth. The Transition Coordinator also frequently attends Management Team meetings to share progress and development of pre-employment transition services .

VR counselors throughout the state will serve on regional Special Education and Transition Boards and Councils.

#### *j. STATEWIDE ASSESSMENT*

*1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:*

*A. With the most significant disabilities, including their need for supported employment services;*

ICBVI completed a Comprehensive Statewide Needs Assessment (CSNA) in FFY 2020 in accordance with the requirements of Section 101.15 of the Rehabilitation Act as amended. Three separate

surveys were developed to thoroughly assess the needs of Idahoans who are blind or visually impaired. The survey participants included a sample of VR clients ( $n$  = ICBVI clients served within the time frame October 1, 2018 through September 30, 2019), all ICBVI staff, and a sample of employers and other key informants.

According to 2017 ACS estimates, 2.9% of the population reported a visual disability in Idaho, which is a higher than the percentage reported in the U.S (2.3%). It should be noted that the population reporting a visual disability in Idaho increased from 2.3% in 2015 to 2.9% in 2017. The percentage of individuals living in Idaho with a visual disability ages 18-34 (1.31%) is slightly higher than the US population (1.13%)

According to the results of the 2020 CSNA, the most common themes that emerged in the area of rehabilitation needs of blind and visually impaired individuals in the state were:

- 32% of all respondents (clients and key informants) identified lack of transportation as the major barrier to employment for individuals who are blind or low vision in Idaho.
- 55% of all key informants interviewed (agencies that provide services to individuals who are blind and visually impaired) reported that societal attitudes, family attitudes, and employer attitudes regarding individuals who are blind or low vision continues to be a major barrier in Idaho.
- 28% of client's surveyed reported independent living and mobility skills are seen as a major need.
- 16% of client's surveyed reported access to career services, education and employment training programs as a significant need.

While the 2020 CSNA does not specifically assess the needs of supported employment (SE) services for the blind and visually impaired, ICBVI does serve individuals other disabilities that require SE supports and services. In the past two years, ICBVI has serviced 16 individuals who require SE services. This number has been increasing every year since 2016. Historically this has been an underserved population by ICBVI. However, since the passage of WIOA, the Commission has worked collaboratively with IESDB to ensure these individuals are made known to the VR program. Since the Idaho Division of Vocational Rehabilitation manages the SE program for the state, individuals who require SE services are required to apply for services at the Division. The Commission is responsible for providing all of the services and supports to address the visual disability, and IDVR provides the necessary employment services, and services required to address the other physical or mental disabilities. All other VR services are negotiated between the two programs.

#### *B. Who are minorities;*

According to the results of the 2020 CSNA, individuals who are blind or low vision and also Hispanic or Native American may be underserved by ICBVI. The existing data indicated a low percent of Hispanic cases served by ICBVI in relation to the percent of the population with any disability in the Hispanic category.

The prevalence by race/ethnicity and vision disability in Idaho and the U.S. are based on 2017 ACS estimates. The prevalence of vision disability for Idahoans is higher than the U.S. in two categories,

white and other. The prevalence of vision disability for White Idahoans (2.9%) is higher than in the U.S. (2.4%). The prevalence of vision disability for Idahoans who identify as Other (4.0%) is higher than in the U.S. (1.5%). The percentage of Idahoans who identify as Hispanics with vision disability is the same (2.1%) than the percentage of Hispanics with a vision disability in the US.

Idaho's demographics are changing. Idaho was the second fastest growing state relative to population in the past 10 years, with the population growing over 17 percent in the decade (US Census Bureau, 2020). Idaho was the fastest growing state by percentage in 2021, growing 2.9 percent and was ninth in total numeric growth at 53,151. While Idaho is traditionally a major state for resettlement, international migration has slowed significantly under the COVID-19 pandemic. Regardless of these conditions, ICBVI remains committed to refugee outreach efforts. To best understand the needs of this population, ICBVI conducts joint staff training in conjunction with the Agency for New Americans, and maintains regular contact and outreach with staff at the International Rescue Committee refugee organization and all three resettlement agencies in the Treasure Valley and Magic Valley regions.

ICBVI also conducts ongoing outreach activities to meet the needs of the Spanish speaking population statewide. A number of these individuals engage in migrant seasonal farm work. The Commission works collaboratively with the DOL, the Community Council of Idaho (a rural-centered, nonprofit serving Latinos in Idaho, and the Idaho Division of Hispanic Affairs) to identify these individuals and processes to best conduct outreach activities.

ICBVI conducts various outreach activities to identify and involve individuals with disabilities from underserved backgrounds. These include but are not limited to:

- Engagement with institutions of higher education;
- Outreach activities to small businesses who are owned by minorities;
- Outreach to medical providers who serve refugee and immigrant populations.

ICBVI also conducts tribal outreach, per our MOU, to the four tribes located in Idaho and the substantial American Indian population residing in the Treasure Valley.

### *C. Who have been unserved or underserved by the VR program;*

The WIOA Advisory Group has specifically identified rural service provision a traditionally underserved area to address in II.c.1 of this plan.

According to the results of the 2020 CSNA, almost all participants surveyed commented on the rural nature of Idaho and the difficulty in providing services with limited financial and staff resources. Along this theme the lack of information in rural areas about ICBVI was also noted.

Other common themes that emerged from the CSNA:

- Individuals living in rural areas, with less access to services, support, training and education, are underserved.
- Language and culture are barriers to certain populations accessing services or seeking employment, including a growing refugee population in parts of Idaho. In-person translation services are not readily available.
- Native American tribes live in isolated locales in Idaho with limited employment options.

- ICBVI has increased outreach efforts and coordination with partner agencies; however, there is a continued need for outreach to potentially unserved populations. The COVID-19 pandemic had a significant negative impact on our outreach activities.
- Access to assistive technology, including internet was identified as a significant barrier. This was especially illuminated during the pandemic; especially for individuals living in rural communities.

The Commission has identified addressing language and cultural barriers as a priority, considering the diversity index in Idaho has increased from 54.9% in 2010 to 61.1% in 2020 (U.S. Census Bureau). Strategies include:

- Outreach to resettlement centers in Idaho (Boise and Twin Falls predominantly)
- Outreach to those agencies that serve refugee and migrant populations
- Strengthen partnerships in the workforce development system to reach these underserved and unserved individuals in the state.
- Utilize telephone-based or internet based translation services (when in person are not available) to bridge language barriers presented by Idaho's growing refugee population.

*D. Who have been served through other components of the statewide workforce development system; and*

ICBVI recognizes the need to increase partnerships with the statewide workforce system to develop innovative programs to serve co-enrolled individuals. ICBVI staff and counselors are committed to providing ongoing training of One Stop Center staff on issues related to blindness and visual impairments. Other strategies include continuing to expand partnerships and encourage coordination of services, developing of new ways to provide for job creation or to provide incentives to employers, and to work cooperatively to remove barriers and stigmas in the workplace.

*E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.*

According to the 2020 CSNA, the most common themes that emerged in this area are:

- Collaboration with Local Education Agencies (LEA) / school districts needs to increase.
- Transition-age youth need more engagement in the workforce.
- Increase collaboration with WIOA partners to develop internships and other work based learning activities.
- There is lack of information regarding ICBVI services and opportunities.

The COVID-19 pandemic presented significant challenges in the delivery of pre-employment transitions services, specifically in the provision of work based learning experiences. The vast majority of Pre-ETS over the past two years have been provided via video conferencing technologies. To help address this, rehabilitation technology, including internet service, were



substantial services in the individualized plan for employment for participants (especially those in rural communities) who required these supports.

Strategies to increase opportunities for work based learning experiences for the duration of this plan include:

- Increase engagement activities with employers. To accomplish this, the Commission's Business Engagement Coordinator will be spending more time with the counselors in all regions to develop work based learning opportunities.
- Increased engagement with regional LEA's and SPED directors. The Commission's Transition Coordinator will be focusing more of her time on meeting with educators during her visits to the regional offices.
- Counselor participation in their regional One Stop's.
- Counselor participation in their regional Transition Councils.

In addition, ICBVI is also addressing the needs of students and youth with disabilities through the following:

- ICBVI is implementing changes in the delivery of pre-employment transition services. The Commission has begun to take a tiered or scaffolded approach to program development that will enhance the delivery of pre-employment transition services to students with disabilities. This educational approach is not uncommon in our public school systems, where programs build upon each other to reinforce skill building and knowledge.
- ICBVI has enhanced outreach efforts to students and youth with disabilities that are not traditionally known to the Commission through collaboration with special education services. ICBVI has increased outreach to mainstream educators, especially 504 coordinators.
- ICBVI continues to focus outreach to parents and families of youth with disabilities, community rehabilitation programs, educators, and other youth servicing agencies. One of the most significant vehicles ICBVI uses to achieve this goal is for our Assessment and Training Center staff to travel around the state to conduct seminars on blindness and visual impairments. Regional staff promote the regional seminars to those unserved and underserved communities.

*2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and*

According to the 2020 CSNA, there is a need to improve the collaboration with CRP's in job training and placement services in the state for ICBVI clients.

To accomplish this, ICBVI will:

- Commit to annually reviewing CRP cooperative agreements and collaboratively identify areas for service improvement;

- Commit to providing training and support with CRP's to help them increase their capacity to provide all employment services, including Pre-Employment Transition Services (Pre-ETS).
- Continue to provide CRP's training in blind skills, and how to work with individuals who are blind or visually impaired. This has been a huge success, and ICBVI is committed to continue doing this in all of the regions across the state as a part of this state plan.

#### 2022 Update:

- In PY20, ICBVI revised the CRP MOU to include significant details around the provision of pre-employment transition services. Work based learning experiences and coaching services were a special area of emphasis. MOU's were reviewed with all participating CRP's via regional trainings.
- In PY 2021, ICBVI began intensive technical assistance with the WINTAC-QE (University of Wisconsin-Madison) in the area of business engagement. Two CRP's in the state agreed to participate in this training. ICBVI anticipates strengthening the partnership with these two CRP's, and ultimately improving competitive integrated employment outcomes for participants served by these programs.
- After a COVID-19 hiatus, ICBVI will resume it's state wide blindness seminars in PY 2022 in which regional CRP's are always invited to these events.

#### *3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act*

Current (2020) data from the Idaho Educational School for the Deaf and Blind (IESDB) reveals that there are 111 students identified in Idaho who are blind or visually impaired (this number does not account for home schooled youth).

According to the 2020 CSNA, the most common themes that emerged in the needs of students include:

- Improve access to assistive technology and training.
- Supports for transition from high school to college.
- Independent living skills training.
- More work-based learning experiences.

Recommendations to improve Transition Services include:

- Provide multiple and a broad variety of work-based learning experiences.
- Increased cross-training and collaboration between agencies and organizations.
- Improve marketing efforts of ICBVI transition services.
- Engage students at a younger age.

To address these needs, the ICBVI Project Coordinator for Transition Services is collaborating with Local Education Agencies (LEAs) in all five administrative regions. This collaboration includes an assessment to determine what transition services were currently being provided by the LEA, and to determine the need for additional pre-employment transition services.

The Transition Project Coordinator also provides technical assistance regarding service changes as a result of WIOA.

Using information provided by the LEAs and Regional ICBVI staff, the Project Coordinator for Transition Services will continue to develop statewide programs founded on the evidence-based practices that are aligned to the five authorized Pre-ETS categories. The Transition Project Coordinator also collaborates with LEAs, institutions of higher education, state and federal programs serving students, and employers to enhance pre-employment transition services provided around the state.

The Project Coordinator for Transition Services is also employing marketing strategies and developing materials to reach students and youth in transition and school district personnel to inform parents, educators, administrators, and others about the ICBVI Vocational Rehabilitation program.

ICBVI / IDVR and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. In addition, ICBVI participates in the planning and coordination of an annual Transition Institute for VR program staff and educators across the state.

The current CSNA clearly articulates the need for both the required and authorized Pre-ETS activities. In responses to this, ICBVI has completed its fiscal forecasting for Pre-ETS, and it is included in the 2020 CSNA. ICBVI will review this forecasting on an annual basis.

#### PY 2022 Update:

In PY 2021, ICBVI started a Community of Practice that is led by the Commission's Transition Coordinator. Members of this community include: ICBVI counselors, Rehabilitation Teachers, and all statewide IESDB Teachers of the Visually Impaired (TVI's). The purpose of this COP is to identify unserved or underserved students who are blind or visually impaired, as well as improving transition services (including Pre-ETS) for students with disabilities who are blind or visually impaired.

Due to the pandemic, ICBVI experienced a significant decrease in the provision of work based learning experiences. Since most pre-employment transition services were delivered remotely, the Commission expanded the delivery of the other four required activities.

ICBVI is resuming its 3 residential programs in the summer of 2022 help at Boise State University: Work Readiness Camp (14-15 year old's), College Days, and the Summer Work Experience Program (SWEP). The Commission has blended the College Days and SWEP into one program, and now offers participants to take a college level course while participating in a work based learning experience.

ICBVI continues to re-assess the needs of students with disabilities coming out of the COVID 19 pandemic. Resuming in-person learning opportunities has been communicated as a high priority from students, parents, and educators.

#### *k. ANNUAL ESTIMATES*

##### *Describe:*

- 1. The number of individuals in the State who are eligible for services*

Population Estimates: Idahoans with Blindness and Visual Impairments (Source: American Community Survey C18120 Employment Status by Disability Status)

Idahoans w/ disabilities in workforce			Idahoans w/visual impairment in workforce	
Year	Census Estimate	Forecast <sup>1</sup>	Census Estimate <sup>2</sup>	Forecast
ACS 2017	59,059		1,417	
ACS 2018	56,306		1,351	
ACS 2019	58,424		1,402	
ACS 2020	57,396		1,378	
2022		58,665		1,408
2023		59,310		1,423

<sup>1</sup>Source: Idaho Department of Labor - Population growth projected through 2029 (1.1% annually).

<sup>2</sup>Update from ACS 2020 S1810 suggests 2.4% of the disability population in Idaho have a visual disability.

*2. The number of eligible individuals who will receive services under:  
A. The VR Program;*

The number of clients served in the VR program took a sharp downturn in early 2020 due to factors related to the pandemic. However, in 2022, numbers of new referrals are beginning to rebound. Our forecast has been adjusted in this PY 2022 State plan modification:

In FFY 2022, Title I, Part B the number of eligible individuals is estimated to be 380

In FFY 2023, Title I, Part B the number of eligible individuals is estimated to be 400

*B. The Supported Employment Program; and*

The Supported Employment (SE) is managed by the Idaho Division of Vocational Rehabilitation. ICBVI no longer receives Title VI funds for the SE program. However, ICBVI does continue to serve all eligible SE clients, including students with disabilities, utilizing Title I funds.

In FFY 2020, ICBVI provided supported employment services to a total of 11 participants (3 youth with the most significant disabilities and 8 adults with the most significant disabilities). In FFY 2021, ICBVI provided supported employment services to a total of 16 participants (8 youth with the most significant disabilities and 8 adults with the most significant disabilities). As required under state agreement, these participants were co-enrolled with the Idaho Division of Vocational Rehabilitation (IDVR).

ICVBI anticipates providing supported employment services to the following over the next 2 years:

FFY 2022

- 8 adults with the most significant disabilities
- 8 youth with the most significant disabilities (including extended services).

FFY 2023

- 8 adults with the most significant disabilities
- 10 youth with the most significant disabilities (including extended services).

The SE projections are included in the section k2A and k4 projections.

*C. Each priority category, if under an order of selection.*

ICBVI is not operating under an Order of Selection. The Commission will continue to monitor fiscal conditions as impacted by WIOA to determine whether or not an Order should be established and/or implemented. ICBVI currently operates a three-tier significance of disability (MSD, SD, D).

*3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and*

ICBVI is not operating under an Order of Selection.

*4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.*

- Title I Part B \$655,000
- Title VI Part B \$0

Estimated costs of services, per individual:

FFY 2022 – ICBVI projects serving 380 individuals with an estimated cost of \$1724 per individual.

FFY 2023 – ICBVI projects serving 400 individuals with an estimated cost of \$1638 per individual.

The COVID-19 pandemic has significantly impacted the VR program. ICBVI experienced a significant decrease in participants and had to alter the manner in which services were provided. The pandemic also had a significant impact on the spending of the 15% reserve for Pre-Employment Transition Services. While ICBVI is beginning to experience an increase in applicants to the program in PY 2022, the longer-term impacts that the pandemic had on the 15% spending requirement is unknown at this time.

ICBVI believes it will be difficult to determine the long-term impact of WIOA on number served without baseline data. While the Commission is committed to extending services to all eligible individuals, the emphasis and spending requirements associated with Pre-ETS requirements will both; (1) diminish overall funds available to individuals categorized as ‘eligible’ and, (2) fundamentally shifts the way ICBVI spends 15% of program funds.

### *I. STATE GOALS AND PRIORITIES*

*The designated State unit must:*

- 1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions*

ICBVI management team revised/modified the goals and priorities based on the recently completed Comprehensive Statewide Needs Assessment (CSNA). New program goals and priorities reflect and align with program changes resulting from WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

ICBVI will continue to develop specific strategies that are in alignment with these goals and priorities.

- 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs*

The Commission’s goals and priorities were informed via the 2020 CSNA conducted by the University of Washington. The goals and priorities were developed through discussions with the

ICBVI Board of Commissioners and through collaboration among WIOA core partner programs. As well, program goals and priorities are identified through the Commission's Strategic Plan (2020-2023).

The 2020 CSNA solicited input from a diverse body of stakeholders, including client's (both current and exited), ICBVI staff, ICBVI Board of Commissioners, employers, CRP's, education officials, consumer groups, and other key stakeholders.

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2023 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

The COVID-19 pandemic did not change the goals and priorities of the VR program.

Goal 1: Increase independence and employment outcomes through quality rehabilitation services.

- Priority 1: Provide quality independent living skills training;
- Priority 2: Improve access to job training and placement services;
- Priority 3: Provide outreach training to all community partners; and
- Priority 4: Improve services to business across the state.

The Commission is still developing metrics to evaluate performance for this goal.

Goal 2: Reduce barriers to employment for individuals who are blind or visually impaired.

- Priority 1: Continued education and training to employers, educators, and community partners;
- Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system;
- Priority 3: Continue to address accessibility issues within the One-Stop system;
- Priority 4: Increase/improve access to assistive technology and training; and
- Priority 5: Increase outreach activities to rural communities.

The Commission is still developing metrics to evaluate performance for this goal. To help address this goal, ICBVI, along with all other WIOA core partners, are going to be presenting at the Idaho Juvenile Justice Association Conference. The goal of this activity will be to inform juvenile justice professionals (along with other agencies who serve this population) on the One Stop System and opportunities for both youth and their families under WIOA.

Goal 3: Improve transition services for students

- Priority 1: Increase work-based learning experiences for students prior to exiting high school;
- Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services; and
- Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-ETS.

The Commission is still developing metrics to evaluate performance for this goal.

Goal 4: Improve VR program efficiency through continuous quality improvement activities

- Priority 1: Revise ICBVI's program satisfaction survey(s) to identify areas for program improvement;
- Priority 2: Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle; and
- Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

PY 2022 update on evaluation of goal 4:

- Priority 1: In PY2021, ICBVI revised the satisfaction survey. The satisfaction rate for all surveys completed was 100%.
- Priority 2: ICBVI has formalized a case file review protocol. With that, the case file review(s) have been revised to include targeted audits around specific elements of the program.
- Priority 3: ICBVI revised the VR Policy manual, and was approved by the Board of Commissioners in May 2022. In January 2022, ICBVI implemented a new data validation policy manual for the RSA 911. In addition, ICBVI has quarterly meetings with IDVR to discuss issues specific to RSA 911 data and reporting.

*3. Ensure that the goals and priorities are based on an analysis of the following areas:  
A. The most recent comprehensive statewide assessment, including any updates;*

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2023 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

The COVID-19 pandemic did not change the goals and priorities of the VR program.

Goal 1: Increase independence and employment outcomes through quality rehabilitation services.

- Priority 1: Provide quality independent living skills training;
- Priority 2: Improve access to job training and placement services;
- Priority 3: Provide outreach training to all community partners; and
- Priority 4: Improve services to business across the state.

Goal 2: Reduce barriers to employment for individuals who are blind or visually impaired.

- Priority 1: Continued education and training to employers, educators, and community partners;
- Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system;
- Priority 3: Continue to address accessibility issues within the One-Stop system;
- Priority 4: Increase/improve access to assistive technology and training; and
- Priority 5: Increase outreach activities to rural communities.

Goal 3: Improve transition services for students

- Priority 1: Increase work-based learning experiences for students prior to exiting high school;
- Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services; and

- Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-ETS.

Goal 4: Improve VR program efficiency through continuous quality improvement activities

- Priority 1: Revise ICBVI's program satisfaction survey(s) to identify areas for program improvement;
- Priority 2: Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle; and
- Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

*B. The State's performance under the performance accountability measures of section 116 of WIOA; and*

ICBVI began reporting Measurable Skill Gains data in PY 20. The state VR program exceeded the negotiated target of 38.5%. The negotiated target for PY 21 is 41%.

The following performance measures are scheduled to be negotiated in PY 21.:

- Employment in the 2nd quarter after exit
- Employment in the 4<sup>th</sup> quarter after exit
- Median earnings 2nd quarter
- Credential attainment

A timeline for the following performance measure has not yet been established:

- Effectiveness in serving employers

The Commission has updated our data sharing agreement, including signing the State Wage Interchange System (SWIS) Agreement. While, ICBVI has requested access to Idaho's Data Management Council to gain access to Idaho's Statewide Longitudinal Data System, the current data exchange environment does not allow for this information to be exchanged in time for reporting purposes. The Commission is working closely with other core WIOA partners on a Workforce Development Quality Initiative (WDQI) grant which seeks to remove barriers through automation and reduce the time required to access this data.

In PY 2021, the Commission implemented a data validation framework and policy which provides strong internal control and quarterly data checks to detect anomalies and errors.

The Commission will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA.

*C. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.*

The Commission has worked closely with RSA on their data dashboard information and utilizes the dashboard to identify and fix inaccuracies in the data collection process and for performance improvement.



ICBVI's last monitoring report was conducted in 2010. The issues identified in this report were addressed and bear no relationship to the goals and priorities identified in this plan outside of the Commission continuing to expand its continuous improvement activities.

*m. ORDER OF SELECTION*

*Describe:*

*1. Whether the designated State unit will implement and order of selection. If so, describe:*

*A. The order to be followed in selecting eligible individuals to be provided VR services*

ICBVI is currently not operating under an Order of Selection. However, the impact of WIOA and the 15% reserve requirement on the ability to serve all client's remains unknown for the future.

*B. The justification for the order*

n/a

*C. The service and outcome goals*

n/a

*D. Time within which these goals may be achieved for individuals in each priority category within the order; and*

n/a

*E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities*

n/a

*2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment*

ICBVI currently is able to serve all eligible clients.

*n. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS*

*1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services*

In PY2018, under agreement with the Idaho Division of Vocational Rehabilitation (IDVR), ICBVI no longer receives any Title VI funds, as IDVR has agreed to manage the SE program for the state.

If needed, the Commission will continue to provide SE services under general Title I funds.

Under a cooperative agreement, IDVR administers the supported employment for the state. All participants who have a SE goal are referred to IDVR services. Under this agreement, IDVR provides all employment services (CRP services) and ICBVI provides all services to address visual impairments and blindness. All other services required for the participant are negotiated between the two agencies.

*2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:*

*A. The provision of extended services for a period not to exceed 4 years; and*

The Idaho Division of Vocational Rehabilitation (IDVR) manages the supported employment program for the state.

ICBVI has collaborated with IDVR on policies and procedures to ensure that extended services are available for youth with the most significant disabilities for up to 4 years, or until the individual turns 25 and no longer meets the definition "youth with a disability." Extended services can be provided following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. ICBVI will support extended services with Title I funds, as needed, and will continue to leverage other sources of extended services.

*B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.*

Under a cooperative agreement, ICBVI shares supported employment cases with IDVR. In addition, ICBVI has and will continue to support clients that require supported employment services through the basic support grant during program participation, and work with community partners, families, and other organizations to develop long term support or natural supports whenever feasible.

*o. STATE'S STRATEGIES*

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

*1. The methods to be used to expand and improve services to individuals with disabilities*

The following strategies will be utilized to address the rehabilitation needs of blind and visually impaired in the state, as identified in the 2020 CSNA:

- Lack of transportation – Due to the rural nature of Idaho, transportation always emerges as a major barrier for individuals. To address this, ICBVI counselors and rehabilitation teachers will increase outreach activities to rural communities. As well, the Assessment and Training Center staff will continue their project of “mobile workshops” in regions across the state. ICBVI regional staff will continue to serve on public transportation boards and commissions that address transportation issues and projects.
- Societal attitudes – Outreach and education will include the “mobile workshops” conducted by our Assessment and Training staff. CRP’s, employers, educators, families are all invited to these regional workshops. ICBVI recently appointed the statewide AT Specialist also serve as a statewide business engagement specialist. A strategy of this individual to increase outreach and training to employers. These mobile workshops were discontinued in PY 20 due to the COVID-19 pandemic but are anticipated to resume in PY 22.

- Independent Living Skills-To address the continuing need of independent living skills training, ICBVI will ensure that rehabilitation teachers are provided opportunities for blind skills training. The VR program recently increased assessment activities for all eligible individuals to ensure all training needs are identified and provided in the IPE. Direct services by the regional Instructors for the Blind and our Assessment and Training Center were significantly limited during the pandemic. However, these activities resumed in PY20 as CDC and state guidance allowed.

Access to career services and training programs – To address this, ICBVI has been working with all WIOA core programs to continue the development of the One-Stop System. As part of One-Stop strategy, ICBVI will also be emphasizing staff participation in all comprehensive and affiliate centers. Participation will include training of One Stop center staff and developing opportunities for co-locating. Additionally, as part of our personal development strategies, staff trainings on Career Pathways, Labor Market Index, and Career Index Plus are all geared to ensuring staff have a 21<sup>st</sup> century understanding of the labor force and training programs.

*2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis*

ICBVI will continue to:

- Conduct assessments of blindness skills on all VR clients to determine their level of competence with the alternative skills of blindness;
- Continue implementing training curricula and timelines for clients to learn how to best utilize their Assistive Technology devices;
- Utilize loaner system and increase the number of models of adaptive technology for clients to try out before we purchase items;
- Maintain comprehensive Assistive Technology supports and training through our Assessment and Training Center, Statewide Assistive Technologist and regional Rehabilitation Teachers.

*3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program*

Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe): ICBVI, along with IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities. This agreement will facilitate ICBVI's engagement with the Native American Indian Tribes that reside within the State to identify methods to better communicate the mission, goals, purpose and programs of ICBVI, and to identify processes to better facilitate referrals into ICBVI programs as well as implementation and completion of programs for employment outcomes.

ICBVI will work collaboratively with Department of Labor and the Idaho Commission on Hispanic Affairs to identify methods to better communicate the mission, goals, purpose and programs of

ICBVI, and to identify processes to better facilitate referrals into ICBVI programs as well as implementation and completion of programs for employment outcomes. ICBVI will continue to collaborate with Department of Education to ensure that transition age students are made aware of ICBVI services and how to access them. This is occurring at a State level with ICBVI's involvement in the Interagency Transition Council as well as regional level where the VR counselors are in direct communication with individual school staff. ICBVI will continue to strengthen its collaborative work with Idaho Educational Services for the Blind and Visually Impaired (IESDB).

*4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services)*

The COVID-19 pandemic significantly altered the manner in which we engaged students in Pre-Employment Transition Services. Most in-person programs and serves were cancelled, including our summer residential programs. Due to pandemic related restrictions, most Pre-ETS activities shifted to a on-line learning environment. Work based learning experiences, a significant part of our programs for our students, were virtually non-existent. However, in person learning and work experiences gradually resumed in in PY 21, and we anticipate resuming our residential summer programs in 2022.

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to promote communication and the sharing of technical expertise in transition planning. The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment. The Commission's Project Coordinator for Transition Services will continue to improve and expand Pre-ETS across the state.

ICBVI is committed to working collaboratively with the IESDB, IDVR, and all regional school districts to identify all eligible (or potentially eligible) secondary students in the state of Idaho. Furthermore, ICBVI is committed to reaching out to rural communities in this effort. ICBVI currently has two summer programs that are targeted towards high school students: 1) Summer Work Experience Program (SWEP) and, 2) College Days. Curriculum in both of these programs is being reviewed, expanded and modified, as appropriate, to ensure they meet all of the criteria of Pre-ETS.

As previously mentioned in this plan, the state VR program (ICBVI and IDVR) have agreed to lower the minimum age for the receipt of Pre-ETS to 14 years old. This will increase the number of students who will be eligible for Pre-ETS in the state.

In PY 2021, the Commission was able to add an Instructor of the Blind position to assist the Project Coordinator with the planning and delivery of Pre-ETS.

*5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State*

ICBVI is committed to working with Idaho's CRP community. ICBVI has implemented training for CRPs who are interested in working with the blind and visually impaired. ICBVI is bringing this

training to every region in the state. In 2018, ICBVI developed a cooperative agreement with all CRP's, which is reviewed on an annual basis with all CRP's who provide services to ICBVI clients; with emphasis on the provision of Pre-Employment Transition Services.

*6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA*

ICBVI and IDVR negotiated levels of performance for MSG's, and began reporting data in PY2020. In PY 20, the negotiated level of performance was 38.5%. The actual level of performance in PY 2020 for the Title IV programs was 52.6%.

In PY 2022, the Title IV programs expect to begin reporting on the remaining performance measures, with the exception of Effectiveness in Serving Employers.

The WIOA Core Partners completed a project in PY 2021 which allowed the partners to track co-enrollment data across programs. This project was financed through a Workforce Data Quality Initiative (WDQI) grant.

While ICBVI has an agreement to access Idaho's Statewide Longitudinal Data System (SLDS) in order to pull education related data elements that will allow ICBVI to better understand what factors promote quality sustained competitive integrated employment, unfortunately, the SLDS education data received to this point is not current enough to use for MSG performance.

The Commission has used the RSA Data Dashboards as an interim tool to better reporting under Section 116. The Commission will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA. We expect to have more complete baseline data by the 2024 plan submission and will then be able to articulate strategies for performance improvement based upon emerging trends and data.

*7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities*

The WIOA Advisory Group, in conjunction with the Idaho Division of Vocational Rehabilitation has agreed that both ICBVI and IDVR will be lead agencies in addressing the continuing education and technical assistance needs of external workforce partners in best serving individuals with disabilities. ICBVI and IDVR will jointly sponsor a yearly needs assessment of workforce partners regarding employment and disability. This collaboration will include the establishment of stand-alone informational products, tailored face-to-face trainings and informal consultation as needed. ICBVI will coordinate activities with mandatory One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission. The Commission will maximize services to individuals with disabilities through increased collaboration and integrated service delivery with various partners in One-Stop centers. Comprehensive information and training will be provided to outside organizations such as, the Department of Mental Health and Welfare's Division of Behavioral Health, School to Work Transition, American Indian Vocational Rehabilitation Services, and Centers for Independent Living. Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

*8. How the agency's strategies will be used to:*

*A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;*

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2021 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

Goal 1: Increase independence and employment outcomes through quality rehabilitation services.

- Priority 1: Provide quality independent living skills training;
- Priority 2: Improve access to job training and placement services;
- Priority 3: Provide outreach training to all community partners; and
- Priority 4: Improve services to business across the state.

Strategies for Goal 1 include:

- Monitor program outcomes through client surveys. ICBVI is updating the VR participant survey for PY 2020.
- Expand statewide business engagement activities through ICBVI initiatives or other activities with WIOA partners.
- ICBVI will improve the strategies utilized to monitor outreach and training for regional offices.
- ICBVI will provide training services through regional instructors and the Assessment and Training Center (ATC).
- Develop new and innovate strategies for the delivery of VR services throughout the state.

Goal 2: Reduce barriers to employment for individuals who are blind or visually impaired.

- Priority 1: Continued education and training to employers, educators, and community partners.
- Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system.
- Priority 3: Continue to address accessibility issues within the One-Stop system.
- Priority 4: Increase/improve access to assistive technology and training.
- Priority 5: Increase outreach activities to rural communities.

Strategies for Goal 2:

- Develop new and/or innovative approaches to outreach and education to our community partners.
- Continued participation in the development of the One-Stop system, with emphasis on service delivery to rural communities.

- Consultation and accessibility training to One-Stop partners to address barriers to individuals who are blind or visually impaired.
- Develop new and innovative strategies for providing rehabilitation technology and disability related skills training.

#### Goal 3: Improve transition services for students

- Priority 1: Increase work-based learning experiences for students prior to exiting high school.
- Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services.
- Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-employment Transition Services.

#### Strategies for Goal 3:

- ICBVI will revise current policies around work-based learning experiences to reflect a more curriculum-based approach to these activities. ICBVI will also begin developing outcome measure for all Pre-Employment Transition Services.
- Collaborate with regional CRP's in the development and provision of work-based learning experiences for students with disabilities. ICBVI will update the current MOU to reflect policy changes in Pre-Employment Transition Services.
- ICBVI will engage LEA's and other key education (Idaho State Board of Education, State Department of Education) stakeholders in the provision of transition services. ICBVI will continue its collaborative efforts with the Idaho Division of Vocational Rehabilitation in the coordination, monitoring, and evaluation of Pre-employment Transition Services in the state.
- Develop new and innovative strategies for providing Pre-Employment Transition Services.

#### Goal 4: Improve VR program efficiency through continuous quality improvement activities

- Priority 1: Evaluate VR program services and delivery
- Priority 2: Monitor program service records to ensure compliance to state and federal laws and regulations.
- Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

#### Strategies for Goal 4:

- Revise ICBVI's program satisfaction survey(s) to help identify areas for program improvement.
- Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle.

- Revise and improve policies, procedures, and internal controls relating to the RSA-911 data collection and reporting.
- Revise and improve policies, procedures, and internal controls relating to Pre-Employment Transition Services.
- Continued participation in the Workforce Data Quality Initiative (WDQI) with WIOA core partners.

*B. Support innovation and expansion activities; and*

ICBVI does not have any innovation and expansion activities planned for the duration of this state plan.

*C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.*

Sections (o)(3) and (o) (4) of the Commission's program specific strategies (contained above) further elaborate on how the ICBVI will address equitable access and participation as it relates to this section.

*p. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS*

*Describe:*

1. *An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:*

*A. Identify the strategies that contributed to the achievement of the goals*

The following is a progress report of our goals and priorities for the current state plan:

**Goal 1 - Increase independence and employment outcomes through quality rehabilitation services.**

PY 2022 Update:

- ICBVI developed a new participant satisfaction survey in PY 20. Any participant who exits with a IPE is encouraged to complete the survey. Participant satisfaction rate was 100% for individuals who completed the survey in PY 20.
- Business Engagement: The Commission entered an Intensive Technical Assistance (ITA) agreement with the VRTAC-QE. This ITA begins early February 2022 and continue until the end of May 2022.
- VR Staff Training: The COVID-19 pandemic created opportunities to explore new and different approaches for VR staff training. The Commission has adopted the Microsoft Teams platform as its platform and repository for all VR related training.
- Direct services to participants were extremely limited during the early part of the pandemic. In PY 2021, the Commission has been increasing our capacity to provide in person services, as CDC and state guidance allows.



***Performance Measures for Goal 1:***

PY 2018

Number of client's who achieved competitive integrated employment- 32

There were no participants who exited the VR program with a supported employment outcome.

Measurable Skills Gains: 14

Pre-Employment Transition Services provided – 324

Average hourly wage at program exit – \$18.40

PY 2020

Number of client's who achieved competitive integrated employment- 22

There were no participants who exited the VR program with a supported employment outcome.

Measurable Skills Gains: 34

Pre-Employment Transition Services provided – 175

Average hourly wage at program exit – 15.08

**Goal 2 – Reduce barriers to employment for individuals who are blind or visually impaired.**

PY 2022 Update: While outreach activities were limited due to COVID-19, the Commission was able to engage participants and community partners in new ways (virtual platforms).

Outreach to LEA's was extremely limited during the pandemic, due to staffing shortages, school closures and other barriers created by COVID-19.

Participation in the One-Stop system continued through the pandemic. In PY2020, ICBVI and the core partners engaged in collaborative effort (Data Labs) to create a common intake process for the state workforce system.

***Performance Measures for Goal 2:***

PY 2018

Total number of referrals to the VR program: 153

- One individual was referred from the tribal VR program.
- No individuals were referred from the One Stop system.

Total number of applications: 129

Total number of individuals found eligible for services: 129

Total number of individuals with an approved IPE: 106

Total number of Hispanic individuals served: 30

*Outreach performance (defined as substantial information shared about the VR program and services)*

Number of contacts to CRP's: 23

Number of contacts to LEA's: 56

Number of contacts to employers: 29

PY 2020

Total number of referrals to the VR program: 137

- No individuals were referred from the tribal VR program.
- No individuals were referred from the One Stop system.

Total number of applications: 64

Total number of individuals found eligible for services:

Total number of individuals with an approved IPE: 73

Total number of Hispanic individuals served: 34

*Outreach performance (defined as substantial information shared about the VR program and services)*

Number of contacts to CRP's: 12

Number of contacts to LEA's: 24

Number of contacts to employers: 23

### **Goal 3 – Improve transition services for students.**

PY2022 Update:

As previously mentioned, engagement with LEA's was extremely limited during the pandemic, due to staffing shortages, school closures and other barriers created by COVID-19.

COVID-19 also limited our ability to engage students in WBLE's with regional employers. However, this is rapidly rebounding in PY 21.

#### ***Performance Measures for Goal 3:***

PY 2018

Total number of client's who received rehabilitation technology services: 141

Total number of regional on-site office visits by the statewide Assistive Technologist: 10

Total number of state-wide training seminars conducted by our ATC: 6

PY 2020

Total number of client's who received rehabilitation technology services: 134

Total number of regional on-site office visits by the statewide Assistive Technologist: 3

Total number of state-wide training seminars conducted by our ATC: 0

**Goal 4:** Improve VR program efficiency through continuous quality improvement activities

PY 2022 Update:

Throughout the pandemic, the Commission worked diligently to make progress with program evaluation and quality assurance activities:

- A Participant Satisfaction Survey was completed and launched in PY 2020;
- RSA-911 dashboards were utilized to make improvements in reporting and program performance;
- A Data Validation Policy and Procedural Manual was implemented in PY 2021;
- Program audits : The current instrument (Survey Monkey platform) was updated for the PY 2020 audit cycle. An Executive Summary of the audits findings was developed to document audit findings, corrective actions, and staff training needs;
- ICBVI began utilizing Power BI for generating program data and reports;
- The Commission completed an Internal Controls Assessment that utilizes the COSO framework. This assessment was completed in PY 2021.

*B. Describe the factors that impeded the achievement of the goals and priorities*

The COVID-19 pandemic had a significant impact on achieving our program goals and priorities in PY 2020.

*2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:*

*A. Identify the strategies that contributed to the achievement of the goals*

ICBVI has collaborated with the general agency to serve clients with SE needs, and will continue that practice. The Commission collaborates with IDVR in setting goals and priorities for the program. A strategy that has been implement the current FFY is the requirement of co-enrollment with IDVR for all eligible individuals who have a SE goal.. This has benefitted ICBVI clients in terms of comprehensive IPE development and case coordination. The two state units have implemented a procedure for tracking co-enrollment, and this is monitored on a quarterly basis.

*B. Describe the factors that impeded the achievement of the goals and priorities*

The ongoing challenge for the state's Supported Employment program to maintain the current level of funding for long term supports from the legislature.

*3. The VR program's performance on the performance accountability indicators under section 116 of WIOA*

Performance of Title IV on 116 Primary Performance Indicators, as reported in the ETA 9169.

Primary Indicator of Performance	PY2018	PY2019	PY2020
Employment Rate-2 <sup>nd</sup> Quarter after Exit	53.6%	59.3%	58.9%
Employment Rate-4 <sup>th</sup> Quarter after exit	53.1%	54.6%	57.3%

Primary Indicator of Performance	PY2018	PY2019	PY2020
Median Earnings-2 <sup>nd</sup> Quarter after exit	\$3734	\$4055	\$4259
Credential Attainment	---	3.8%	40.3%
Measurable Skill Gains	35.3%	51.2%	52.6%
Effectiveness in Serving Employers	---	---	---

*4. How the funds reserved for innovation and expansion (I&E) activities were utilized*

n/a

*q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES*

*Include the following:*

- 1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities*

Supported employment services are provided to our blind or visually impaired clients who have multiple disabilities, who have the most significant disabilities, who are consequently are eligible to receive supported employment services. These multiple disabilities include developmental disabilities, traumatic brain injuries, and mental illness or a combination of these disabilities. SE services are provided by the community rehabilitation programs which are accredited by CARF or RSAS.

Supported Employment Services include the following:

Time limited services needed to include job coaching and communication with the employers, to support training while the individual is employed. Continued funding of SE cases is contingent upon progress toward learning the essential functions of the job and/or fading hours of ongoing support to the level of employer satisfaction immediately prior to the assessment of initial stability.

Any other service that would be identified as requisite to the targeted supported employment outcome after placement ahead of transfer to externally funded ongoing support services.

SE may also include Customized Employment elements, after placement.

Extended services for youth are available for qualifying youth in the absence of other ongoing support services available in the community.

ICBVI and IDVR provide the upfront training until the clients are stabilized on their jobs and at that point they are transferred to the long-term support services through Health and Welfare HCBS waiver or the IDVR Extended Employment Services (EES) Program.

Extended services are available to youth with most significant disabilities for up to 4 years, or until the individual turns 25 years old and no longer meets the definition of a “youth with a disability”, whichever comes first.

*2. The timing of transition to extended services*

WIOA extended the SE time period from 18 to 24 months. The Commission has created protocols for and has made extended services for youth available when needed as required by WIOA.

Extended services may be provided to youth with MSD for a period not to exceed four years, or until the individual reaches the age of 25 and no longer meets the definition of a "youth with a disability" (whichever comes first) with the funds reserved under §363.22. SE services for adults will not exceed 24 months, unless an exception is granted. The Commission requires a third-party commitment to designate a long-term support provider. Since 2004, the Extended Employment Services (EES) program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability. Periodic monitoring occurs to ensure that each client receiving SE services is making satisfactory progress.

### *VOCATIONAL REHABILITATION (BLIND) CERTIFICATIONS*

*States must provide written and signed certifications that:*

- 1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];*

*Enter the name of designated State agency or designated State unit, as appropriate*

Idaho Commission for the Blind and Visually Impaired

- 2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17], the Rehabilitation Act, and all applicable regulations[18], policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;*

*Enter the name of designated State agency*

Idaho Commission for the Blind and Visually Impaired

- 3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19], the Rehabilitation Act, and all applicable regulations[20], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;*
- 4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;*
- 5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.*
- 6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.*

- 7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;*

*Enter the name of authorized representative below*

Beth Cunningham

Administrator

*8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;*

*Enter the title of authorized representative below*

Beth Cunningham

Administrator

*9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.*

#### *Footnotes*

*[14] Public Law 113-128.*

*[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.*

*[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.*

*[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.*

*[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.*

*[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.*

*[20] Applicable regulations, in part, include the citations in footnote 6.*

#### *CERTIFICATION SIGNATURE*

Signatory information	Enter Signatory information in this column
Name of Signatory	Beth Cunningham
Title of Signatory	Administrator
Date Signed	03/14/22

#### *ASSURANCES*

*The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR*

services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

<i>The State Plan must include</i>	<i>Include</i>
<i>1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.</i>	
<i>2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.</i>	
<i>3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:</i>	
<i>3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act</i>	
<i>3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):</i>	
<i>3.b.(A) "is an independent State commission" (Yes/No)</i>	Yes
<i>3.b.(B) "has established a State Rehabilitation Council" (Yes/No)</i>	No
<i>3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act</i>	
<i>3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)</i>	
<i>3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)</i>	No
<i>3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)</i>	No
<i>3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan</i>	No
<i>3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act</i>	
<i>3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act</i>	

<i>The State Plan must include</i>	<b>Include</b>
<i>3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act</i>	
<i>3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act</i>	
<i>3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities</i>	
<i>3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act</i>	
<i>4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:</i>	
<i>4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act</i>	
<i>4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act</i>	
<i>4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)</i>	Yes
<i>4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act</i>	
<i>4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act</i>	
<i>4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act</i>	
<i>4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act</i>	
<i>4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act</i>	
<i>4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs</i>	
<i>4.j. With respect to students with disabilities, the State,</i>	
<i>4.j.i. Has developed and will implement,</i>	
<i>4.j.i.I. Strategies to address the needs identified in the assessments; and</i>	
<i>4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and</i>	
<i>4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))</i>	
<i>5. Program Administration for the Supported Employment Title VI Supplement:</i>	



<i>The State Plan must include</i>	<b>Include</b>
<i>5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act</i>	
<i>5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act</i>	
<i>5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act</i>	
<i>6. Financial Administration of the Supported Employment Program:</i>	
<i>6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act</i>	
<i>6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act</i>	
<i>7. Provision of Supported Employment Services:</i>	<b>Yes</b>
<i>7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act</i>	
<i>7.b. The designated State agency assures that:</i>	
<i>7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act</i>	
<i>7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act</i>	

#### VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

##### **Performance Goals for the Core Programs**

*Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the*

*Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.*

*For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.*

*For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit);*
- *Credential Attainment Rate; and*
- *Measurable Skill Gains*

*The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

*The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.*

*For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit); and*
- *Credential Attainment Rate*

*VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.*

*The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.*

*Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.*

*States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.*

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	58.9%	59.5%	58.9%	60.0%
Employment (Fourth Quarter After Exit)	57.3%	57.8%	57.3%	58.3%
Median Earnings (Second Quarter After Exit)	\$4,365	\$4,400	\$4,472	\$4,500
Credential Attainment Rate	42.8%	42.8%	45.3%	44.0%
Measurable Skill Gains	55.1%	55.1%	57.6%	57.6%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> *“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.*